

**HONG LEONG FINANCIAL GROUP BERHAD**

# **Code of Conduct & Ethics**

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## CODE OF CONDUCT & ETHICS

### Table of Contents

	<b>Page</b>
Purpose	3
Scope	3
Policy Statement	3
PRINCIPLE 1: COMPETENCE	4
Continuous Professional Development and Training	4
PRINCIPLE 2: COMPLIANCE	5
Personal Declarations on Legal and Regulatory Proceedings, Fitness and Propriety	5
Compliance with Laws and Regulations	
Competition Laws	6
Anti-Money Laundering and Counter-Financing of Terrorism	7
PRINCIPLE 3: INTEGRITY	8
General Conduct	8
Integrity of Records and Information	8
The Group's Assets	8
Personal Finances	9
Reporting Illegal or Unethical Acts	10
Critical Incident Reporting	11
PRINCIPLE 4: CONSUMER PROTECTION	12
Fiduciary Duties	12
PRINCIPLE 5: CONFIDENTIALITY	13
Protecting Confidential Information	13
Misuse of Information	13
Disposal or Return of Confidential Information	14
Press Releases, Public Statements, Appearances and Appointments	14
Social Media Usage	15
PRINCIPLE 6: OBJECTIVITY	16
Conflict of Interest	16
Misuse of Position	17
Anti-bribery and Corruption, Gifts and Entertainment	17
PRINCIPLE 7: WORK ENVIRONMENT	19
Safe Workplace	19
Diversity and inclusion	20
Sustainability	
Drug- free Workplace and Alcohol Consumption	20
Definitions	21
Policy Document Information	22

## **PURPOSE**

Hong Leong Financial Group Berhad, its subsidiaries and their subsidiaries directly or indirectly controlled by them and their subsidiaries (collectively, the “**Group**” and each of them, a “**Group company**”) are committed to a high standard of professionalism and ethics in the conduct of our business and professional activities as set out in this Code of Conduct and Ethics (“**Code**”).

This Code is designed to observe and comply with all applicable laws and regulations and regulatory requirements. Employees at branches/subsidiaries of the Group located outside Malaysia are expected to know and comply with the laws, regulations and Codes of Conduct that apply to you. In cases where local laws and/or regulations prescribe different requirements, the stricter of the requirements shall apply.

## **SCOPE**

This Code applies to:

- i. All employees who work in the Group – including but not limited to permanent, part-time and temporary employees;
- ii. Any other persons permitted to perform duties or functions within, or for and on behalf of, the Group – including but not limited to vendors, suppliers, contractors, secondees, interns and industrial attachment (collectively, “**third party service providers**”).

## **POLICY STATEMENT**

You are responsible for fully understanding and complying with the Code. You are required to attend any training provided in relation to the Code and provide an affirmation that you have read, fully understood and will comply with the Code, annually.

**The Code also forms part of the terms and conditions of your employment/ engagement with the Group company you are employed/engaged with (the “Company”). Any failure to comply with this Code or any the Group policies relevant to your role will be treated very seriously by the Group. Such failure shall constitute misconduct and may result in disciplinary action, up to and including termination of employment (for employees) or termination of your engagement or relationship (in relation to third party service providers)with the Company.**

There are seven (7) key principles to the Group’s Code as below:

- i. COMPETENCE
- ii. COMPLIANCE
- iii. INTEGRITY
- iv. CONSUMER PROTECTION
- v. CONFIDENTIALITY
- vi. OBJECTIVITY
- vii. WORK ENVIRONMENT

## **PRINCIPLE 1: COMPETENCE**

The Group is committed to ensuring that its employees develop and maintain the relevant knowledge, skills and behaviour to ensure that our business operations and activities are conducted professionally and proficiently.

### **Continuous Professional Development and Training**

As an employee, you must help ensure the Group meets its legal, compliance and regulatory obligations, as well as stakeholder and customer expectations, by possessing and maintaining the skills and knowledge needed to perform your role. To do so, you must:

#### **ATTAIN COMPETENCE**

- i. Ensure you meet competency standards of the Group;
- ii. Carry out your duties and responsibilities responsibly and competently;
- iii. Seek help from your immediate superior to fill in any gaps in skill, knowledge or expertise;
- iv. Ensure you understand the steps to be taken to achieve the required competence.

#### **MAINTAIN COMPETENCE**

- i. Keep up to date with the job requirements;
- ii. Continuously learn and improve your skills, knowledge and expertise for your role and job function;
- iii. Proactively keep abreast with changes in law, regulation and industry best practice relevant to your role and function, and to your employer's business.

## **PRINCIPLE 2: COMPLIANCE**

### **Personal Declarations on Legal and Regulatory Proceedings, Fitness and Propriety**

The Group continuously assesses employees to ensure their suitability for the roles they perform.

You must promptly declare to the HR Department any criminal, legal or regulatory proceedings in which you are involved, whether or not the proceedings relate to the Group, including:

- i. Any arrest, charge, conviction or legal proceeding relating to a criminal charge including unresolved criminal charges, however minor;
- ii. Any inquiry or action by a financial institution regulator, law enforcement agency or similar authority; or
- iii. Any legal claims against you relating to fraud, dishonesty, or unfair or unethical conduct committed by you.

You do not need to declare minor traffic offenses. If you have questions on whether you need to declare a criminal, legal or regulatory proceeding, contact the HR Department.

Where an employee is identified to hold a position of key responsibility, the Company is required to assess his/her fitness and propriety prior to appointment and at regular intervals thereafter, based on criteria relating to:

- i. Probity, personal integrity and reputation;
- ii. Competence and capability; and
- iii. Financial integrity.

If you have been identified as an employee holding a position of key responsibility requiring a 'fit and proper' declaration and assessment, you must notify the HR Department without delay of any information that may materially compromise your fitness and propriety.

### **Compliance with Laws and Regulations**

You must comply at all times with all applicable laws, regulations and regulatory requirements, and be open and transparent with regulators. Remember that it is important to comply with not just the letter, but also the spirit and intent, of the law. You must fully cooperate with, and provide accurate information for any internal or external investigations, subject only to confidentiality requirements or legal privilege.

Additionally, you are responsible for fully understanding and ensuring compliance with legal or regulatory requirements which are specific to your role and/or as an employee.

Violations of the Code or any laws, regulations, or regulatory requirements that apply to the Group may weaken regulator, stakeholder or customer confidence and put our reputation at risk. This can result in negative repercussion for the Group such as regulator criticism, legal action, fines and penalties. As such, you may be subjected to disciplinary action for violations of the Code, up to and including dismissal.

Misconduct that will result in disciplinary actions also includes:

- i. Violating, assisting or asking others to violate the Code;
- ii. Failing to raise a known or suspected violation of the Code; and/or
- iii. Retaliating against another employee or third party for raising a concern in good faith or for participating in an investigation.

Where appropriate or where required to do so, the Group may also:

- i. Seek remedies in a civil court including but not limited to monetary damages and/or a court order prohibiting an employee or individual from continuing to violate the Code or any laws, regulations, or regulatory requirements that apply to the Group;
- ii. Report such violation to the police, law enforcement agencies and/or regulators, which may result in criminal liabilities and/or penalties for the violating employee or individual; and
- iii. Report such violation in employment records databases maintained by regulatory authorities and/or industry bodies which may be referred to by future employers during the employment process.

### **Competition Laws**

You must ensure that your actions towards business partners, competitors and governmental authorities at all times reflect fair and proper business practices and are in compliance with the laws and regulations governing competition. Among conduct that you shall comply with include:

- i. To not engage in or enter into any form of agreement, arrangement or concerted practice with an actual or potential competitor that is or may be deemed to be anti-competitive, such as fixing prices, sales or markets.
- ii. To not communicate or share commercially sensitive information with actual or potential competitors, or third parties who may potentially pass such information to competitors.
- iii. To use commercially sensitive information for legitimate purposes only.

**Anti-Money Laundering and Counter- Financing of Terrorism**

- i. All persons, including employees, third-party service providers and business partners, must abide by the laws and regulation pertaining to Anti-Money Laundering and Counter Financing of Terrorism.
- ii. Employees and third-party service providers must always ensure that they are conducting business with reputable counterparties, for legitimate business purposes and with legitimate funds and if they suspect money laundering activities, they must report it to their respective Head of Department, Compliance Representative or the relevant person designated by the Company.

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**COMPLIANCE: IMPORTANT FURTHER READING**

Key policies relating to compliance with the INTEGRITY principle which you must comply with at all times include:

- i. Bank Negara Policy on Fit & Proper Criteria
- ii. Bank Negara Policy on Anti-Money Laundering, Counter Financing of Terrorism and Targeted Financial Sanctions
- iii. Compliance Policy

### **PRINCIPLE 3: INTEGRITY**

The Group's vision, mission and values identifies a strong values-based culture to guide decisions, actions and interactions with stakeholders as a key enabler for the success of the Group.

#### **General conduct**

Each of us has a responsibility to uphold the Code and as an employee of the Group, we have a duty to demonstrate the highest standards of business conduct by doing the right thing.

The Group relies on you to practice sound decision-making and take actions that will preserve a strong values-based culture in the workplace. You are responsible for your decisions and must not engage in unethical or illegal conduct, even where you are acting on the instructions of another colleague, your manager or superior. If you are ever unsure of the proper course of action, you should seek advice from your Head of Department, Compliance Department or HR Department, as appropriate.

#### **Integrity of Records and Information**

Recordkeeping policies and controls are essential to the successful operation of the Group and our ability to meet our legal and business obligations. Each of us is responsible for being accurate, complete and honest in the Group's records and for complying with all of the recordkeeping policies, controls and procedures we have in place.

You must never falsify any book, record or account that relates to the business or activities of the Group, customers, employees, suppliers or our assets. This means being honest and accurate in all aspects of your job, including without limitation entries you make on expense reports, timekeeping records, results you record on sales incentive plans and claims you make under our employee benefit plans.

Accounting records and reports must be complete and accurate. You must never make entries or allow entries to be made for any account, reports, records or documents that are false or would obscure the true nature of the transaction, as well as to mislead the true authorisation limits or approval by the relevant authority of such transactions.

#### **The Group's Assets**

Our assets are the resources we use to conduct our business. You are to use the Group's assets for legitimate business activities and appropriately safeguard them including against cyber-related attacks, theft, loss, waste, improper use or abuse.



Our assets include without limitation:

- i. Physical assets, such as office furnishings, facilities, cars, equipment and supplies;
- ii. Technology assets, such as laptops, tablets, computer hardware, software and information systems;
- iii. Financial assets, such as cash; and
- iv. Information assets, such as intellectual property, including information about products, services, systems and other data.

The Group monitors how you use our assets, including email and internet, as permitted by law and regulation, to detect misconduct.

### **Intellectual Property**

- i. Any invention, improvement, literary rights, copyrights, trademarks, patents and/or new discoveries (“the Intellectual Property”) which originates from or is conceived by you, whether alone or with any person or persons while in the employment of the Company, which relates either directly or indirectly to the Group, shall belong to and be the absolute property of the Company.
- ii. You shall promptly disclose to the Company all such Intellectual Property made by you alone or with any person or persons and shall hold such Intellectual Property on trust for the Company.
- iii. You shall assign and hereby agree to assign to the Company any and all rights to the Intellectual Property, as and when directed by the Company and further agree that the Company and its successors and/or assigns shall have the absolute right to use experimentally or commercially the Intellectual Property or any part thereof.
- iv. You shall at the request and expense of the Company do all things necessary or desirable to substantiate the rights of the Company as mentioned here.
- v. This provision shall not apply to any invention for which no equipment, supplies, facilities, know-how or trade secret information of the Group was used and which was developed entirely on your personal time and which does not relate to the business of the Group, directly or indirectly, or the Group’s actual or demonstrated anticipated research and/or development, or which does not result from the work performed by you for the Group.

### **Personal Finances**

As an employee, any improper handling of your personal finances could undermine your credibility and the reputation of the Company. It could also cause others to question your decision-making on the job or task that you are handling. Therefore, you must handle your personal finances responsibly, with integrity, and in compliance with all relevant laws and regulations and the contractual terms to which you are bound. In relation to your borrowings, you must not and must not be seen to have abused your position for your personal advantage and the aggregate of your debts shall not cause you serious pecuniary indebtedness.

You must not promote or participate in illegal financing schemes, tontine schemes (kootu funds) and otherwise carry on illegal activities for your own personal gain or the gain of others.

The Company reserves the right to carry out checks on an employee's past, as well as present financial activities and patterns. Where an employee fails to fulfil his/her financial obligations as and when they fall due or has been the subject of a judgement debt which is unsatisfied, either in whole or in part, the Company may take appropriate action, including:

- i. Removing the employee from certain positions or roles e.g. position of authority, cash handling etc.
- ii. Termination of employment if the employee is declared bankrupt or is no longer suitable to be employed by the Company.

An employee's career advancement may also be impacted as a result of his/her poor financial standing, such as his/her promotion being withheld.

### **Reporting Illegal or Unethical Acts**

You must speak up if you witness or if you are improperly instructed to carry out any illegal or unethical act within the Group, including wrongdoing by employees or third parties (such as customers, regulators, vendors or business partners).

You are required to promptly report any known or suspected violations of the Code, any Group policy or any law, regulation or regulatory requirements applicable to the Group's business. Reporting is required whether or not you are involved in the violation.

Just as you will be held responsible for your own actions, you can also be held responsible for failing to report the actions of others if you knew or should reasonably have known that they were in violation of the Code, any applicable policy, law, regulation or regulatory requirements.

Your report will be handled discreetly and shared where necessary, for example with persons who are involved in investigating, resolving, or remediating the issue. If you have concerns about possible retaliatory action, you may lodge a report with your Head of Department or Compliance Representative, the Compliance Department or through the Company's whistleblowing channel.

### **Critical Incident Reporting**

It is the responsibility of an employee who encounters a Critical Incident (i.e. material financial, legal, regulatory, reputational or operational risk or impact to the Group or a Group company) to immediately notify their manager, immediate superior, Head of Department and/or Compliance Department (in relation to legal and regulatory incidents) for prompt communication to other Head of Department as necessary. This is to enable the Group or relevant Group company to manage the situation appropriately in order to mitigate any risk posed or impact to the Group or the relevant Group company.

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### **INTEGRITY: IMPORTANT FURTHER READING**

Key policies relating to compliance with the INTEGRITY principle which you must comply with at all times include:

- i. Whistleblower Protection Act 2010
- ii. Whistleblowing Policy and Whistleblowing Procedures
- iii. Retention Policy
- iv. Compliance Policy

#### **PRINCIPLE 4: CONSUMER PROTECTION**

We must act responsibly and be fair and transparent in our business practices, including treating our colleagues, stakeholders, customers and business partners with respect and consider the impact of our decisions and actions on them.

##### **Fiduciary Duties**

You have a duty to act in the best interest of the Group and its customers (where applicable).

You have a duty to act with integrity, conducting yourself in an open, honest and accountable manner and avoiding any acts that might damage the reputation of the Group. At all times, you must:

- i. Comply with applicable laws and regulatory requirements regarding consumer protection;
- ii. Fully embrace the principle of treating consumers fairly in carrying out your role;
- iii. Ensure that promotion and marketing method is fair, clear and not misleading;
- iv. Bear in mind the financial literacy of the target group of your sales and marketing efforts;
- v. Obtain or confirm information about the needs of the customer;
- vi. Ensure that any product and/or service offered is suitable to fulfil the needs of the customer;
- vii. Be transparent in the provision of information about a product and/or service, including its features, risks and rewards;
- viii. Give customers equal access to such information;
- ix. Handle customer data securely and keep customer data confidential; and
- x. Take customer complaints seriously.

In conducting your work with integrity, you must:-

- i. Not take unfair advantage of anyone through manipulation, concealment, abuse of confidential information, misrepresentation of material facts, or other unfair dealings or practices; and
- ii. Comply with all relevant laws and regulations that specifically prohibit discrimination against current or prospective customers and business partners on the basis of race, sex, religion, or other non-risk factors.

## **PRINCIPLE 5: CONFIDENTIALITY**

### **Protecting Confidential Information**

Our employees, business partners and customers trust us to protect their confidential information, whether that information relates to financial, personal or business matters. Confidential information can be written, oral or electronic and includes a wide variety of data – including but not limited to technology applications, business strategies, customer lists, credit procedures, customer and personnel information.

In the course of, or after cessation of your employment/engagement, you must not disclose or misuse confidential information of the Group, its employees, business partners or customers, for any reason whatsoever. You have a duty to protect such confidential information and where disclosure of such confidential information is duly authorised, to take precautions before sharing it with anyone, inside or outside the workplace:

- i. Do not share confidential information with friends or family, third parties or with colleagues who are not authorised to receive such information;
- ii. Do not discuss confidential information in public or common places where others could hear you (corridors, lift, lobby etc.);
- iii. Do not access or use confidential information for unauthorised purposes;
- iv. Do not widely circulate confidential information, in internal mass postings, or outside the Group (including to your own personal email address), unless permitted to do so under applicable law, regulations, and internal policy or procedures;
- v. Collect confidential papers immediately from printers, photocopiers and fax machines;
- vi. Be vigilant about whether your computer screen or papers can be read by someone else;
- vii. Use passwords and regularly change passwords. Do not share your passwords with anyone;
- viii. Ensure hard copy confidential information is stored in locked cabinets and soft copies securely stored; and
- ix. Shred any documents containing confidential information when they are no longer needed.

### **Misuse of Information**

You are prohibited from using material, confidential or non-public information about the Group, our employees, our customers or third parties or other companies that conduct business with us for unauthorised purposes or to gain a direct or indirect advantage for yourself or any other person.

You must not deal or procure any person to deal in the securities of any company listed or pending listing on a stock exchange at any time when you are in possession of information which you know, or reasonably ought to know, is inside information. You must also keep such inside information confidential and not

disclose such information to any person who is not authorised to receive such information. In addition to a breach of the Code, such dealing or disclosure of inside information may also constitute a criminal offence.

**'Inside information'** is information relating to a public listed company which is not generally available to the public and which, if made generally available, a reasonable person would expect to have a material effect on the price or value of the securities of such company.

**'Dealing'** includes acting as principal or agent, in acquiring or disposing (or agreeing to acquire or dispose) such securities. Procuring or inducing another person to deal is also prohibited.

### **Disposal or Return of Confidential Information**

Disposal of confidential information must be done in a way that protects the confidentiality of the information. Paper records must be shredded and storage media must be formatted in a way that ensures third parties or unauthorised persons cannot access the information.

### **Press Releases, Public Statements, Appearances and Appointments**

You must not make any (oral, written or other) public statement, regarding the Group unless with prior written approval from President & CEO. This includes without limitation our internal policies, financial information, internal affairs or corporate affairs, or any statement containing or relating to the Group's confidential or proprietary information.

In case of matters concerning the Group, only the President & CEO are authorised to make or release any statements on the Group or the relevant Group company to the media or the public, provided that they are for the purpose of communicating sales, marketing, customer services or public relationship and related information.

You must promptly inform your President & CEO if you are approached by a member of the media to comment on any matter pertaining to the Group or a Group company.

Unless with prior written approval from President & CEO, you must not:

- i. Accept offers for media exposure for the promotion of self or self-interests;
- ii. Participate as a speaker in talks, seminars, conferences that are not sanctioned by the Group or your Company;
- iii. Accept appointments to councils, committees or boards for any associations, governmental or non-governmental organisations, societies etc. in your capacity as a Company employee. For appointments in your personal capacity, please read carefully the section on **Conflict of Interest**

- iv. Give reference for any person or entity in the Group's capacity or use the Group's name, save insofar as required in the course of normal business.

When in doubt, you must consult the Legal and Compliance Department and seek approval from your President & CEO.

### **Social Media Usage**

You must use good judgment in the use of social media and other online activity.

Be mindful not to disclose confidential and/or proprietary information of the Group. Do not post or seek posting of confidential information or information which could cause reputational damage to the Group, its employees, stakeholders, customers or business partners.

Such restricted postings include referrals, recommendations, materials subject to intellectual property rights, photos, videos, etc. Information that might damage the reputation of the Group is not to be posted or disseminated and should be reported to HR Department should you become aware of such information.

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### **CONFIDENTIALITY: IMPORTANT FURTHER READING**

Key policies relating to compliance with CONFIDENTIALITY principle which you must comply with at all times include:

- i. Financial Services Act 2013
- ii. Personal Data Protection Act 2020
- iii. Personal Data Protection Policy
- iv. [Corporate Communications Policy]

## **PRINCIPLE 6: OBJECTIVITY**

You must not allow any conflict of interest, bias or undue influence of others to override your business and professional judgment. You must not be influenced by friendship, relationships or association in performing your role. Decisions must be made on a strictly arms-length business basis.

### **Conflict of Interest**

You must not engage directly or indirectly in any personal or business activity that competes or conflicts with the interest of the Group:

i. Other Business Interests and employment

Conducting any non-Group paid or unpaid employment or business activity (including acquiring another business) is prohibited.

You must not undertake paid or unpaid employment or other business activities outside of the Company's working hours unless you have prior written approval from your Head of Department and the HR Department. Approval shall be granted only where the interests of the the Company and the Group will not be prejudiced.

If you have a financial interest in a customer of the Group – for example as a sole proprietor, partner, shareholder, creditor or debtor, such an interest must be disclosed immediately to the HR Department. You must not be directly involved in the Group's dealings with the customer so long as the interest continues to exist.

ii. Corporate Directorships

You must not serve as a director of a legal entity without the approval of the HR Department.

iii. Trusteeships

You may only accept an appointment as an executor, administrator or trustee of estates of a Group customer if you have prior written approval from the HR Department. If such an appointment is made without your knowledge, you must notify the HR Department without delay to obtain their approval to retain such appointment once you become aware. Such approval shall not be unreasonably withheld.



iv. Working with Relatives

Employees should not work with their immediate family members (i.e. spouses, parents, siblings or children) as colleagues, or with another colleague with whom they have a romantic relationship, in the same Division/ Department/ Branch and/ or in a position of direct and /or indirect subordination or supervision within the Company/Group. You must promptly declare any such situations to the HR Department. The Company has the right to take all necessary steps to ensure any element of conflict is removed, including requiring the transfer of affected colleagues.

When in doubt about any potential situation of conflict, you must consult the HR Department and declare the relationship.

**Misuse of Position**

You must not use your position to influence other employees, current and potential customers or business partners of the Group to act in your personal interest or in the interest of anyone other than the Group.

For the avoidance of doubt, you are prohibited from using or allowing the use of the Group's name or facilities, your position and/or connection with the Group:

- i. To gain personal advantage for yourself or for others, including in political, investment or other activities.
- ii. To gain preferential treatment for yourself or for others, such as in purchasing goods, securities and in obtaining loans.
- iii. For speculative activities in commodities (gold, silver etc.), foreign exchange or securities, whether acting personally or on behalf of another.
- iv. To engage employees of other financial institutions in unethical and/or prohibited arrangements for personal or mutual gain, e.g. approving a bank loan in return for obtaining approval for your bank loan, bypassing relevant policies and procedures.

You must not enter into prohibited transactions through nominees. Immediate family members (i.e. spouses, parents, siblings or children) are presumed to be nominees.

**Anti-bribery and Corruption, Gifts and Entertainment**

You must at all times comply with local anti-bribery and corruption laws and regulations. In Malaysia, the main legislation is the Malaysian Anti-Corruption Commission Act 2009. Severe penalties, including heavy fines and imprisonment, can be applied to any person found guilty of bribery or corruption.

**You are strictly prohibited from giving or receiving a gift or entertainment which is, or which appears to be inappropriate or excessive, taking into account all relevant facts and circumstances.**

You must promptly declare any gift or entertainment which you (or others on your behalf) give or receive in accordance with your Company's Gifts and Entertainment Procedures.

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#### **OBJECTIVITY: IMPORTANT FURTHER READING**

Key policies and regulations relating to compliance with OBJECTIVITY principle which you must comply with at all times include:

- i. Malaysian Anti-Corruption Commission Act 2009 ("**MACC Act**")
- ii. Guidelines on Adequate Procedures issued by the Prime Minister's Department pursuant to s17A(5) MACC Act
- iii. Anti-Bribery and Corruption Policy
- iv. Gifts and Entertainment Procedures
- v. Donations Policy

## **PRINCIPLE 7: WORK ENVIRONMENT**

### **Safe Workplace**

A safe and healthy workplace is important to the wellbeing of every employee. We rely on you to comply with applicable laws such as the Occupational Safety and Health Act 1994 and the Group's policies as they relate to ensuring the health, safety and security of our workforce, our customers and others who may be present on our premises.

We are committed to a non-violent working environment, free of threats, intimidation and physical harm. Any acts or threats of violence towards another person or the Group's property must be reported immediately. The unauthorised possession or use of weapons, or menacing references to weapons, while at work, on the Group's property or while on Group business or during Group sponsored events, is also prohibited.

We work in an industry where the threat of criminal activity is real. Practice good physical security habits and be alert to ensure the safety of co-workers and customers. Don't allow unauthorized individuals into secure areas. Anyone asking to make a delivery or provide a service should be able to show valid identification, which should indicate, where appropriate, their affiliation with the organization they represent. We rely on you to promptly report any criminal activity or situations that could pose a threat to you or to others.

You are to always practice the following:

- i. If you become aware of any actual or potential health or safety hazard, report it immediately to your manager or immediate superior;
- ii. Any accidents at work involving injury or damage must be reported immediately to your manager or immediate superior; and
- iii. Always maintain a clean, hazard free and healthy environment by keeping passageways clear, stack and store.

### **Diversity and Inclusion**

The Group employs/engages people from a variety of backgrounds and origin, experience and culture. Discrimination of any kind is strictly prohibited, including any discrimination based on race, colour, nationality, ancestry, citizenship status, creed, religion, age, gender, medical or health condition, pregnancy, parental status, marital status, or physical disability.

You must not, at any time, engage in, or support acts of harassment or inappropriate or abusive conduct by or against our employees, customers or business partners. Examples of unacceptable conduct include unwelcome jokes, threats, physical contact, derogatory comments, teasing, bullying, intimidation or other offensive or abusive language or action.

The Group will not tolerate discrimination, harassment or intimidation and will take all allegations seriously. It is the responsibility of every colleague to report to the HR Department of any behaviour or conduct that is unlawful, abusive or otherwise violates this Code.

### **Sustainability**

The Group is committed to reduce the effect of our operations on the environment so that we are able to build our franchise in a safe and healthy environment. We aim to do this by managing the resources we use across the Group and raising staff awareness about the importance of caring for the environment. The Group will be mindful of its activities with employees, customers, business partners and the community we operate within to maintain our social responsibility. You must contribute and build a legacy of growth, performance, integrity and ethical leadership by these common values and share our Group's commitment to sustainability and aim to create lasting social benefits when performing your duties or function within the Group.

### **Drug-free Workplace and Alcohol Consumption**

You must not sell, manufacture, distribute, possess, use or be under the influence of illegal drugs at all times, whether in the workplace or outside, or whether during working hours or beyond.

You must not consume alcohol at any time during the working day, and/or at any official or business event, to such a level that your ability to work is significantly impaired.

### **Office**

The primary purpose of an office is to support you in performing your job and you are reminded to always be mindful and sensitive in your actions and words at the office. The Group prohibits you from:-

- i. Carrying out personal activities such as promoting religious or political beliefs amongst co-workers;
- ii. Carrying out political campaigns at the office; and
- iii. Performing prayer ritual at the office work space or public space without the prior approval of the HR Department.

Key policies and regulations relating to compliance with the ENVIRONMENT principle which you must comply with at all times include:

- Occupational Health and Safety Act 1994

## **DEFINITIONS**

The following capitalised words used in this Code shall have the meanings as shown below:

“BNM”	means Bank Negara Malaysia
“Code”	means this Code of Conduct and Ethics
“Company”	means the Group company that an employee or third party service provider is employed with / engaged by (as applicable)
“Group”	HLFG, its subsidiaries and their subsidiaries directly or indirectly controlled by them and their subsidiaries (each of them, a “ <b>Group company</b> ”)
“HLFG”	means Hong Leong Financial Group Berhad
“President & CEO”	means the President & CEO of HLFG
“HR Department”	means the Human Resource Department of a Group company
“Head of Department”	heads of departments in a Group company

POLICY DOCUMENT INFORMATION

<b>Policy Owner</b>	Human Resources Director	
<b>Responsible Person(s)</b>	Heads of Departments	
<b>Version No. and Date Approved</b>	Version 1	19 <sup>th</sup> September 2018
	Version 2	27 <sup>th</sup> January 2021
<b>Summary of Revisions</b>	<p>The Code were streamlined under seven (7) principles with references to relevant policies as follows:</p> <ol style="list-style-type: none"> <li>1. Competence <sup>*NEW</sup> All employees are to develop and maintain the relevant knowledge, skills and behaviour required for their role</li> <li>2. Compliance Alignment to Fit &amp; Proper Criteria, Anti-Money Laundering, Counter Financing of Terrorism and Targeted Financial Sanctions and Compliance Policy</li> <li>3. Integrity Alignment to Whistleblowing policy to include reporting on illegal or unethical acts and critical incident</li> <li>4. Consumer Protection <sup>*NEW</sup> All employees have a duty to act in the best interest of HLFGB and its customers</li> <li>5. Confidentiality Alignment to Personal Data Protection Act 2020</li> <li>6. Objectivity Alignment to Gift &amp; Entertainment Policy</li> <li>7. Work Environment <sup>*NEW</sup> All employees are expected to ensure that the work environment is safe</li> </ol>	
<b>Effective Date</b>	27 <sup>th</sup> January 2021	
<b>Next Review Date</b>	Jan 2022	

<b>Relevant Legislation</b>	<ul style="list-style-type: none"> <li>i. BNM Policy on Fit &amp; Proper Criteria</li> <li>ii. Malaysian Anti-Corruption Commission Act 2009 (“MACC Act”)</li> <li>iii. Guidelines for Adequate Procedures issued by the Prime Minister’s Department pursuant to s17A(5) of the MACC Act.</li> <li>iv. BNM Policy on Anti-Money Laundering, Counter Financing of Terrorism and Targeted Financial Sanctions for Financial Institutions</li> <li>v. Occupational Health and Safety Act 1994</li> <li>vi. Financial Services Act 2013</li> <li>vii. Personal Data Protection Act 2010</li> </ul>
<b>Related Policies and Procedures</b>	<ul style="list-style-type: none"> <li>i. Anti-Bribery and Corruption Policy</li> <li>ii. Gifts and Entertainment Procedures</li> <li>iii. Donation Policy</li> <li>iv. Retention Policy</li> <li>v. Whistleblowing Policy</li> <li>vi. Whistleblowing Procedures</li> <li>vii. Personal Data Protection Policy</li> </ul>
<b>Reviewed and Concurred By</b>	Human Resources Director
<b>Approved By</b>	<ul style="list-style-type: none"> <li>1. President, HLFG</li> <li>2. BARMC</li> <li>3. Board of Directors, HLFG</li> </ul>