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**HONG LEONG FINANCIAL GROUP BERHAD  
GROUP WHISTLEBLOWING POLICY****1. PURPOSE**

To provide an avenue for employees of Hong Leong Financial Group Berhad (“**HLFG**”) and any other person to raise genuine concerns about any improper conduct or wrongful act (“**Improper Conduct**”) involving HLFGB through HLFGB’s whistleblowing channel on a confidential basis.

**2. SCOPE OF APPLICATION**

2.1. The following persons may raise any genuine concerns about any Improper Conduct via HLFGB’s whistleblowing channel:

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

2.2. HLFGB subsidiaries shall respectively have a whistleblowing policy, which principles shall be aligned and consistent with this Group Whistleblowing Policy.

**3. POLICY STATEMENT**

HLFGB is committed to good business ethics and integrity as set out in HLFGB’s Code of Conduct and Ethics. All persons are encouraged to raise genuine concerns about Improper Conduct involving HLFGB at the earliest opportunity, and in an appropriate way, through available channels under this Group Whistleblowing Policy or Group Compliance Policy (for employees).

**4. TYPES OF CONCERNS THAT MAY BE RAISED**

4.1 You should raise any genuine concerns about any Improper Conduct involving HLFGB and/or that may adversely impact HLFGB, 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 breach of HLFGB’s Code of Conduct and Ethics or Improper Conduct which would be a disciplinary offence; or
- Any gross mismanagement of company affairs.

4.2 Please note that any grievance of a personal nature or that relates to your employment should be raised through HR grievance procedures and not through this Group Whistleblowing Policy or the Whistleblower Form.

- 4.3 Any genuine concerns on Improper Conduct involving and/or affecting HLFG Group Companies shall be raised via the respective whistleblowing channels in the relevant HLFG Group Company, and not through HLFG's whistleblowing channel. However, where the alleged Improper Conduct concerns the designated recipient of a whistleblowing report in that HLFG Group Company, 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:

**Chairman of the 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 : [hlfqwhistleblowing@hongleong.com.my](mailto:hlfqwhistleblowing@hongleong.com.my)

- 5.2. 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.
- 5.3. HLFG reserves the right not to investigate any alleged Improper Conduct which is raised anonymously.
- 5.4. Additionally, you also have the right to raise your concerns with relevant regulators, such as Bank Negara Malaysia or law enforcement agencies.

## 6. ACTIONS WHICH MAY BE TAKEN AGAINST YOU

- 6.1 Subject to 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 concerns 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 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.

**7. DISCLOSURE OF YOUR PERSONAL INFORMATION**

Please note that we may have to disclose your personal information to the board of directors, the investigation team and Chief Internal Auditor (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**

Capitalised terms used in this Group Whistleblowing Policy are defined as follows:

<b>APG or AP Guidelines</b>	means the Guidelines on Adequate Procedures issued by the Prime Minister’s Department pursuant to s17A(5) of the Malaysian Anti-Corruption Commission Act 2009
<b>CGPD or Corporate Governance PD</b>	means the Corporate Governance Policy Document issued by Bank Negara Malaysia
<b>HLFG</b>	means Hong Leong Financial Group Berhad
<b>HLFG Group Company</b>	means a subsidiary of HLFG
<b>Improper Conduct</b>	has the meaning set out in paragraph 1 and includes the list set out in paragraph 4.1
<b>MMLR</b>	means the Bursa Malaysia Main Market Listing Requirements
<b>WPA</b>	means the Whistleblower Protection Act 2010