



Whistleblowing Policy

Version 2.2

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|  | Whistleblowing Policy | Version 2.2 |
| | | Effective Date: 19 May 2025 |

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SECTION 1: IMPORTANT NOTICE

Document Access

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SECTION 2: INTRODUCTION AND GLOSSARY

1. Purpose

To provide an avenue for employees of Hong Leong Islamic Asset Management Sdn Bhd (“HLISAM”) and other person to raise genuine concerns about any improper conduct or wrongful act (“**Improper Conduct**”) in relation to HLISAM and/or any person associated with HLISAM through HLISAM’s whistleblowing channel on a confidential basis.

2. Scope of Application

The following persons may raise any genuine concerns about any Improper Conduct vide HLISAM’s whistleblowing channel:

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

3. Policy Statement

HLISAM is committed to good business ethics and integrity as set out in the HLISAM’s Code of Conduct and Ethics. All employees are encouraged to raise genuine concerns about Improper Conduct in relation to HLISAM and/or any person associated with HLISAM at the earliest opportunity, and in an appropriate way, through available channels under this Whistleblowing Policy.

4. Policies, SOP, Legal and Regulatory Provisions

This Policy shall be read together with other relevant policies and standard operating procedures (“**SOP**”) of HLISAM and any law, regulations and guidelines issued by regulators including but not limited to the following: -

- (a) Whistleblower Protection Act 2010;
- (b) Guidelines on Adequate Procedures issued by the Prime Minister’s Department pursuant to s17A (5) of Malaysian Anti-Corruption Commission Act 2009;
- (c) HLISAM’s Code of Conduct and Ethics;
- (d) HLISAM’s Anti-Bribery and Corruption Policy and SOP;
- (e) HLISAM’s Compliance Policy;
- (f) HLISAM’s Whistleblowing SOP;
- (g) any other applicable laws, guidelines, circulars, directives, orders, policy documents, notifications and standards issued by regulatory bodies; and
- (h) any other applicable policies and SOP issued by HLISAM from time to time

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5. Definitions

| Term | Meaning |
|--------------|---|
| BOD or Board | Board of Directors of Hong Leong Islamic Asset Management Sdn Bhd |
| HLISAM | Hong Leong Islamic Asset Management Sdn Bhd |
| Policy | Whistleblowing Policy |

6. Policy Document Information

| | |
|---|---|
| Policy Owner | Head of Compliance Department. |
| Persons responsible for updating this Policy | Head of Compliance and Manager of Compliance Department. |
| Responsible Person(s) to comply with this Policy | All staff or directors of HLISAM and any (legal or natural) person, including those providing services to, or having a business relationship with HLISAM. |
| Summary of Changes | Refer to Schedule 1 of this Policy. |
| Version No. | 2.2 |
| Approved Date | 19 May 2025 |
| Effective Date | 19 May 2025 |
| Next Review Date | 18 May 2026 |
| Related forms, publications and websites. | Whistleblower form. |
| Reviewed and Concurred by | N/A |
| Endorsed by | N/A |
| Approved by | Acting Principal Officer |

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SECTION 3: POLICY

1. Types of Concerns That May Be Raised

- 1.1 You should raise any genuine concerns about any Improper Conduct in relation to HLISAM and/or any person associated with HLISAM, including but not limited to:
 - (a) Any criminal offences, including fraud, corruption, bribery and blackmail;
 - (b) Any misappropriation or misuse of funds or assets, theft or embezzlement;
 - (c) Any financial irregularity or impropriety;
 - (d) Any failure to comply with legal or regulatory obligations;
 - (e) Any breach of HLISAM's Code of Conduct & Ethics or Improper Conduct which would be a disciplinary offence; or
 - (f) Any gross mismanagement of company affairs.
- 1.2 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 Whistleblowing Policy or the Whistleblower Form.
- 1.3 Genuine concerns or Improper Conduct involving HLISAM and/or any person associated with it shall be raised vide the HLISAM's whistleblowing channel, and not through other Hong Leong Financial group of companies' whistleblowing channel. However, where the alleged Improper Conduct concerns the designated recipient of a whistleblowing report in HLISAM, such concern shall be reported through the HLCB's whistleblowing channel.

2. Who To Raise Concerns To

- 2.1 Reports of any alleged Improper Conduct may be made to:

(a) Independent Director of Hong Leong Asset Management Bhd's Board of Directors

Hong Leong Islamic Asset Management Sdn Bhd
Level 18, Plaza Zurich
No 12, Jalan Gelenggang
Bukit Damansara
50490 Kuala Lumpur
Email: IndDirector@hlisam.hongleong.com.my

(b) Via HLISAM's Official Website, ie: [https:// https://hlam.com.my/hlisam/](https://hlam.com.my/hlisam/)

- 2.2 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 (please refer to Appendix I) to provide the details required.
- 2.3 HLISAM reserves the right not to investigate any alleged improper which are raised anonymously.
- 2.4 Additionally, you also have the right to raise your concerns with relevant regulators, such as Bank Negara Malaysia, Securities Commission, Bursa Malaysia Securities Berhad (or any of their related companies) or with law enforcement agencies.

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3. Actions Which May Be Taken Against You?

- 3.1 Subject to paragraph 3.2 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).
- 3.2 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.

4. Disclosure of Your Personal Information

Please note that we may have to disclose your personal information to the board of directors, Head of Internal Audit and 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 and your 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.

5. Your Involvement in the Investigation

You will only be required to assist if and when more information is needed during the investigation of the alleged Improper Conduct.

Appendix I



WHISTLEBLOWER FORM

You should raise any genuine concerns about any improper conduct or wrongful act ("Improper Conduct") in relation to Hong Leong Islamic Asset Management Sdn Bhd ("HLISAM") and/or any person associated with HLISAM through IndDirector@hlisam.hongleong.com.my. Concerns on your personal position or your employment, should be raised through HR grievance procedures, and not through this Whistleblower Form.

| | | |
|---|----------|------------|
| YOUR FULL NAME | | |
| NAME OF YOUR EMPLOYER | | |
| YOUR STAFF ID (if an employee of HLISAM) | | |
| YOUR DEPARTMENT | | |
| YOUR POSITION / DESIGNATION | | |
| YOUR CONTACT DETAILS | Address: | Telephone: |
| | | Email: |

| DETAILS OF YOUR CONCERNS | |
|--|--|
| 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) <input type="checkbox"/> Yes <input type="checkbox"/> No | |

| |
|---|
| <p align="center">ADDITIONAL INFORMATION SHEET</p> |
| <p>ANY ADDITIONAL INFORMATION:</p> <p>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 Islamic Asset Management Sdn Bhd, etc.</p> |

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Schedule 1 – Summary of Changes made to the Whistleblowing Policy

| Ver. | Date | Policy Matter | Ref. | Proposed Material Change(s) |
|------|------------|---------------|------|---|
| 1.0 | 4/12/2020 | All | New | Pursuant to the 'Policies and Standard Operating Procedures Documentation Policy' approved by the Board of Directors on 25 August 2020, the existing policy document dated 10 October 2019, Version 1.0 is drafted in accordance with the new prescribed format. Version 1.0 is now retired. |
| 2.0 | 23/07/2021 | All | All | <ol style="list-style-type: none"> 1) Added Purpose, Application of Policy, Policy Statement and Policy Information to align with the prescribed policy format as reflected in the Policies and SOP Documentation Policy. 2) Extend application of policy to directors. 3) Expand on list of types of genuine concerns that may be raised. 4) Provide situations where the whistleblowing protection may be revoked. 5) Provide for disclosure of whistleblowers personal information where required. 6) Provide for whistleblower's involvement in investigation where required. 7) Updated the whistleblower form. |
| 2.1 | 23/04/2024 | 4 | 7 | <ol style="list-style-type: none"> 1) Clarified that genuine concerns may be raised concerning "any person associated with HLAM" in addition to that involving HLAM e.g. directors, partners, contractors, agents, employees (whether temporary, fixed-term or permanent) or any other person performing work or services for or on behalf of HLAM. 2) Policy Information - Updated details (i.e. dates, version no. etc) 3) Application of Policy – header changed to "Scope of Application". 4) Types of Concerns That May be raised – the types of concerns have been added. |

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| | | Appendix 1 | 11 | 5) Paragraph 3.3 – additional paragraph added to provide avenue of escalation to HLCB's whistleblowing channel. 6) Disclosure of Your Personal Information - Added whistleblowing report to the list of information that is not to be disclosed to a Recipient who is implicated in the Improper Conduct reported 7) Whistleblower Form – added email contact. |
| 2.2 | 19/05/2025 | All | All | 1) Revised the entire policies document format in line with Hong Leong Group's Governing Documents Policy and SOP requirements. 2) Housekeeping amendments i.e. re-numbering of sections and paragraphs throughout the policies. |