




# **Whistleblowing Policy**

**Version 2.2**

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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 Asset Management Bhd (“HLAM”) and other person to raise genuine concerns about any improper conduct or wrongful act (“**Improper Conduct**”) in relation to HLAM and/or any person associated with HLAM through HLAM’s whistleblowing channel on a confidential basis.

### 2. Scope of Application

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

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

### 3. Policy Statement

HLAM is committed to good business ethics and integrity as set out in the HLAM’s Code of Conduct and Ethics. All employees are encouraged to raise genuine concerns about Improper Conduct in relation to HLAM and/or any person associated with HLAM 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 HLAM 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) HLAM’s Code of Conduct and Ethics;
- (d) HLAM’s Anti-Bribery and Corruption Policy and SOP;
- (e) HLAM’s Compliance Policy;
- (f) HLAM’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 HLAM from time to time.

### 5. Definitions

The following terms used in this Policy are defined as follows:

Term	Meaning
BOD or Board	Board of Directors of Hong Leong Asset Management Bhd
HLAM	Hong Leong Asset Management Bhd
Policy	Whistleblowing Policy

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## 6. Policy Document Information

<b>Policy Owner</b>	Head of Compliance Department.
<b>Responsible Person(s)</b>	All staff or directors of HLAM and any (legal or natural) person, including those providing services to, or having a business relationship with HLAM.
<b>Summary of Changes</b>	Refer to Schedule 1 of this Policy
<b>Version No.</b>	2.2
<b>Approved Date</b>	19 July 2024
<b>Notification Date (BARMC)</b>	21 August 2024
<b>Effective Date</b>	19 July 2024
<b>Next Review Date</b>	18 July 2025
<b>Related Policies and Procedures</b>	Whistleblowing Standard Operating Procedures
<b>Reviewed and Concurred by</b>	N/A
<b>Endorsed by</b>	N/A
<b>Approved by</b>	CEO

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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 HLAM and/or any person associated with HLAM, 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 HLAM's Code of Conduct & Ethics or Improper Conduct which would be a disciplinary offense; 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 HLAM and/or any person associated with it shall be raised via the HLAM's whistleblowing channels, 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 HLAM, 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 the Board of Directors**

**Hong Leong Asset Management Bhd**  
Level 18, Plaza Zurich  
No 12, Jalan Gelenggang  
Bukit Damansara  
50490 Kuala Lumpur  
Email: IndDirector@hlam.hongleong.com.my
  - (b) Via HLAM's Official Website, ie: <https://hlam.com.my/>
- 2.2 Please include your full name and contact details, as well as full details of your concern and any 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 HLAM reserves the right not to investigate any alleged improper which is 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.

### 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

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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.

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**Appendix I**



**WHISTLEBLOWER FORM**

You should raise any genuine concerns about any improper conduct or wrongful act ("Improper Conduct") in relation to Hong Leong Asset Management Bhd ("HLAM") and/or any person associated with HLAM through [IndDirector@hlam.hongleong.com.my](mailto:IndDirector@hlam.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 HLAM)		
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)? Yes <input type="checkbox"/> No <input type="checkbox"/>



**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 Asset Management Bhd, etc.

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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	21 July 2020	All	All	Pursuant to the 'Policies and Standard Operating Procedures Documentation Policy' approved by the Board of Directors on 24 October 2019, the existing policy document dated 1 June 2018, Version 1.1 is drafted in accordance with the new prescribed format. Version 1.1 is now retired.
2.0	22 July 2021	Objective Policy Information Application of Policy Policy Statement  Application of Policy  Types of Concerns That May be Raised Actions Which May Be Taken Against You?  Disclosure of Your Personal Information  Your Involvement in the Investigation  Whistleblower Form	1 8 1 2  1  3.1 5.2  6  7  Appendix I	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	25 April 2024	Objective   Policy Information  Scope of Application  Types of Concerns That May be Raised  Types of Concerns That May be Raised	1   8  1  3.1  3.3	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) Updated details (i.e. dates, version no. etc) 3) Application of Policy – header changed to "Scope of Application". 4) The types of concerns have been added. 5) Additional paragraph added to provide avenue of escalation to HLCB's whistleblowing channel.

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		Who To Raise Concerns To	5.1(b)	6) Added the whistleblowing channel, ie: via HLAM Website.
		Disclosure of Your Personal Information	7	7) 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.
		Whistleblower Form	Appendix I	8) Added email contact.
2.2	TBA	All	All	1) Revised the entire policies document format in line with Hong Leong Group's Governing Documents Policy and SOP requirements.
		All	All	2) Housekeeping amendments i.e. re-numbering of sections and paragraphs throughout the policies.