



Whistleblowing Policy

	Department : Compliance	Version: 2.1
	Title : Whistleblowing Policy	Effective Date: 25 April 2024

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SECTION 1 : IMPORTANT NOTICE

Document Access

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SECTION 2 : AMENDMENT LOG

No.	Section No.	Page No.	Revision Status	Brief details of Amendments	Date of Approval
1	All	All	New	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.	21 July 2020
2	All	All	Revision	<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. 	22 July 2021
3	3, 4 and Appendix 1	All	Revision	<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) 	25 April 2024

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				<ul style="list-style-type: none"> 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. 5) Paragraph 3.3 – additional paragraph added to provide avenue of escalation to HLCB’s whistleblowing channel. 6) Added the whistleblowing channel, ie: via HLAM Website. 7) 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. 8) Whistleblower Form – added email contact. 	
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SECTION 3: INTRODUCTION AND GLOSSARY

1. Objective

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. Applicability

This Policy applies to all staff or directors of HLAM and any (legal or natural) person, including those providing services to, or having a business relationship with HLAM.

3. Retired Policies and Related Policies

This version of the Whistleblowing Policy replaces version 2.0 issued on 22 July 2021.

4. Availability of Policy Document

This Policy document is made available to all employees via HLAM’s Common Directory.


Any amendments and updates made to the Policy document shall upon approval of the Board be made available in the Common Directory. Employees will be notified through email of any developments.

5. Maintenance and Review

The owner of this Policy document is the Compliance Department, who shall be responsible to ensure that changes to the regulatory or internal requirements where relevant are immediately incorporated into this document and submitted to the Board for approval before implementation, unless implementation is required to be done immediately in which case, the Board’s ratification will be required at the next Board meeting. In any event, at least a yearly review of this Policy document is required.

6. Effective Date

The Whistleblowing Policy or any amendments thereto shall take effect from the date of approval by the Board or CEO.


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7. Interpretation

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

8. Policy 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 HLAM and any (legal or natural) person, including those providing services to, or having a business relationship with HLAM.
Summary of Changes	<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.
Approved Date	25 April 2024
Effective Date	25 April 2024
Next Review Date	24 April 2025
Related forms, publications and websites.	Whistleblower form.
Version No.	Version 2.1
Approved by	CEO.
Notified to	BARMC

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SECTION 4 – POLICY

1. 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.

2. 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.


3. Types of Concerns That May Be Raised

3.1 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.

3.2 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.

3.3 Genuine concerns or Improper Conduct involving HLAM and/or any person associated with it shall be raised vide 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.

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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. Who To Raise Concerns To

5.1 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/>


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 (please refer to Appendix I) to provide the details required.

5.3 HLAM reserves the right not to investigate any alleged improper which is raised anonymously.

5.4 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.

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

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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, 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.

8. 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. 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 <i>(if an employee of HLAM)</i>		
YOUR DEPARTMENT		
YOUR POSITION / DESIGNATION		
YOUR CONTACT DETAILS	Address:	Telephone:
		Email:

DETAILS OF YOUR CONCERNS

DESCRIPTION OF IMPROPER CONDUCT: <i>(use the additional information sheet, if necessary)</i>
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"/>

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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.