

# WHISTLEBLOWING POLICY

MCIS Insurance Berhad

Compliance Department

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<b>Policy Title:</b>	Whistleblowing Policy

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## 1. Document Information and History

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<b>Date</b>	<b>Version</b>	<b>Change Reference</b>
24 February 2010	1.0	New
1 August 2014	2.0	Revised <i>[to supersede the "Whistle Blowing Policy" issued by Risk Management Department dated 24 February 2010]</i>
1 June 2018	3.0	Revised Item 5.2: Board delegate to Audit Committee to review the whistleblowing investigation report and provide advice accordingly. Item 5.5 and 6.5: Add requirements on communication. Item 9: Update the related regulatory requirements.
2 December 2020	4.0	Revised Item 5.5 (d), (e) and (f): Add timeline on acknowledgement of receipt from whistleblower Item 5.7 (a): Added reporting channel to Sanlam Group Item 8: Anti-Bribery & Corruption Policy

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2 June 2021	5.0	<p>Transferred policy ownership to Compliance</p> <p>Added Head of Compliance as a new WBC member</p> <p>Added Reporting Matrix for Whistleblowing</p> <p>Added law enforcement agencies contacts</p>
21 October 2021	6.0	<p>Revised by Trident Integrity Solutions Sdn Bhd as follows:</p> <ol style="list-style-type: none"> <li>1. Added definition of gratification</li> <li>2. Added definition of retaliation</li> <li>3. Added the role of Chief Internal Auditor as the person in charge to receive whistleblowing cases via dedicated channel. Whistleblowing Committee has no access to the details of whistleblower, only the fact of case for discussion and facilitation of investigation</li> <li>4. Added the role of IAD and Chief Internal Auditor</li> <li>5. Updated the Reporting Matrix for Whistleblowing to affect item 3 above and the change of Audit Committee Chairman.</li> <li>6. Updated the Guiding Principles &amp; Minimum Standards</li> <li>7. Added deviation clause</li> <li>8. Added compliance clause</li> </ol>
25 August 2022	7.0	<p>Key amendments:</p> <ol style="list-style-type: none"> <li>1. Clarification on role and responsibility of MCC in new paragraph 5.5.</li> <li>2. Provide for in the absence of the Chief Internal Auditor (“CIA”), the Chief Compliance Officer will perform the CIA’s responsibilities under the Policy, and consequential amendment where the CIA is the wrongdoer, in new paragraph 5.8.2 and new footnote to paragraph 5.10(a).</li> <li>3. Provide for annual review of the Policy.</li> </ol>
5 May 2023	8.0	<p>Revised the email addresses for Chairman of BAC and Chairman of MCIS to dedicated whistleblowing inboxes.</p>

## **2. Purpose / Overview**

- 2.1 MCIS Insurance Berhad (“MCIS” or “Company”) encourages an open and transparent system of working and dealings between the employees, agents, policyholders and members of general public coming into contact with MCIS.
- 2.2 With this regard, MCIS has established the Whistleblowing Policy (“Policy”) to show its commitment on the highest standards of ethics, integrity and professionalism in all the activities and operations that it conducts.
- 2.3 The primary objectives of this Policy are to:
  - a) Encourage employee, or any other person coming into contact with MCIS, to report suspected wrongdoing as soon as possible to Senior Management with the knowledge that his/her concerns will be taken seriously, investigated appropriately and treated confidentially;
  - b) Ensure employee, or any other person coming into contact with MCIS, feel supported in speaking up in confidence and reporting concerns or matters they suspect may involve anything improper, unethical or inappropriate;
  - c) Provide employee, or any other person coming into contact with MCIS, with guidance as to how to raise those concerns;
  - d) Provide assurance or reassure employee, or any other person coming into contact with MCIS, that they should be able to raise genuine concerns in good faith without fear of reprisals or victimisations or any unfair treatment or any harassment;
  - e) Deter wrongdoing and to promote good standards of corporate practices;
  - f) Enable Senior Management to be informed at an early stage about the concerns so that all the improper or unethical or inappropriate behaviour can be challenged at all levels within the Company; and
  - g) Ensure that all cases of suspected wrongdoing are reported and managed in a timely, appropriate and professional manner, with sensitivity and by the appropriate person.

## **3. Scope of Coverage / Applicability**

- 3.1 All directors, employees, agents, shareholders, policyholders, parties in a direct contractual and/or fiduciary relationship with the Company, or any other person coming into contact with the Company, are eligible to make Protected Disclosures under the Policy.
- 3.2 The Protected Disclosures must be in relation to matters concerning the Company and its functioning.
- 3.3 The Policy should not be used for raising frivolous, malicious, unfounded or baseless allegations, inclusive personal vendetta.

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- 3.4 Whistleblower who makes false or baseless allegations, with a mala fide intention or knowing it to be false or baseless would be subject to Disciplinary Action, as appropriate, and will not be protected under the Policy.
- 3.5 This Policy does not apply with regard to:
- 3.5.1 the Company's policies and procedures for individual employee grievances or complaints relating to performance appraisal, terms and conditions of employment and/or performance reward which will continue to be administered and reviewed by Human Resource Department; and
- 3.5.2 the Company's policies and procedures in relation to agency's related matters governed under the Business Support Department.

#### 4. Definitions

Terminology	Description / Definition
Disciplinary Action	Any action that can be taken on the completion of or during the investigation proceedings, including but not limiting to a warning, imposition of penalty or fine, suspension from official duties, or any such action as is deemed to be fit considering the gravity of the matter (i.e. involvement of law enforcement, engagement of legal counsel, etc)
Good faith	A sincere belief or motive without any malice or the desire to defraud others or consideration of personal benefit or vendetta.
Gratification	Gratification is defined in the Malaysian Anti-Corruption Commission Act 2009 ("MACCA") to mean the following: <ul style="list-style-type: none"> <li>a) money, donation, gift loan, fee, reward, valuable security, property or interest in property being property of any description whether movable or immovable, financial benefit, or any other similar advantage;</li> <li>b) any office, dignity, employment, contract of employment or services, and agreement to give employment or render services in any capacity;</li> <li>c) any payment, release, discharge or liquidation of any loan, obligation or other liability, whether in whole or in part;</li> <li>d) any valuable consideration of any kind, any unlawful discount, commission, rebate, bonus, deduction or percentage;</li> <li>e) any forbearance to demand any money or money's worth or valuable thing;</li> <li>f) any other service or favour of any description, including protection from any penalty or disability incurred or apprehended or from any action or proceedings of a disciplinary, civil or criminal nature, whether or not already instituted, and including the</li> </ul>

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<b>Terminology</b>	<b>Description / Definition</b>
	<p>exercise or the forbearance from the exercise of any right or any official power or duty; and</p> <p>g) any offer, undertaking or promise, whether conditional or unconditional, of any gratification within the meaning of any of the preceding paragraphs a) to f).</p>
Investigator	Authorized or appointed or consulted persons, either internal or external parties, or Department to carry out the necessary investigation for the reported concerns (i.e. Protected Disclosures).
Protected Disclosures	Any communication or concern made in good faith that discloses or demonstrates information that may evidence unethical / improper activity or suspected fraud or abuse transaction.
Retaliation	<p>One or more of the following:</p> <p>a) Interference with the lawful employment or livelihood of a person, including discrimination, discharge, demotion, suspension, disadvantage, termination or adverse treatment in relation to the complainant's employment, career, profession, trade or business or the taking of disciplinary action;</p> <p>b) Withholding of payment that is due and payable under a contract;</p> <p>c) Refusal to enter into a subsequent contract;</p> <p>d) Action causing injury, loss or damage;</p> <p>e) Intimidation or harassment; and</p> <p>f) A threat to take any of the actions above.</p>
Whistleblower	A person who raises in good faith the concern or exposes wrongdoing, misconduct, alleged dishonest or illegal activity occurring in the Company. The person will not be expected to prove the concern or wrongdoing that he/she believed to has witnessed or suspect. The person is deemed as making Protected Disclosures and will be fully protected under this Policy (whereby his/her identity will be kept confidential and no unfair treatment or discrimination or harassment or victimization or retaliation will be meted out to the person).
Whistleblowing	The act of raising a concern or disclosure about wrongdoing within the Company. The concern must be a genuine concern involving mismanagement, malpractice, corruption, illegality, misconduct or any serious irregularities.
Whistleblowing Committee	A Committee set up for the purpose of administering the Policy.

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## 5. Roles & Responsibilities

### 5.1 Board of Directors (“Board”)

The Board shall be responsible to:

- a) Oversee the sound and prudent management of whistleblowing practices.
- b) Designate a non-executive director to be responsible for the effective implementation of this Policy.
- c) Ensure Protected Disclosures are properly investigated and professionally attended to while whistleblowers are well protected in accordance with this Policy.
- d) Provide advice to Whistleblowing Committee (“WBC”), Chief Executive Officer (“CEO”) and/or Investigator with regard to the investigation.
- e) Approve any changes or review of this Policy.

### 5.2 Audit Committee (“AC”)

The Board has delegated to the AC the following responsibilities as stated below:

- a) Review the whistleblowing investigation report conducted by the Investigator to ensure that the proposed action and recommendation are appropriate, thorough and executed impartially.
- b) Provide advice to WBC and/or Investigator on any Protected Disclosures that are sensitive in nature /serious in its gravity.
- c) Provide advice to WBC and /or Investigator with regard to investigation or recommend course of action for Protected Disclosure that directly implicating the CEO or any other members of the Board.

### 5.3 Chairman of the Audit Committee (“AC Chairman”)

- a) Ensure effective implementation of this Policy which includes evaluating periodic reports that monitor and assess how concerns are escalated and dealt with and overseeing periodic reviews of the effectiveness of this Policy.
- b) Escalate to WBC any Protected Disclosure received from whistleblowers.

### 5.4 Chief Executive Officer (“CEO”)

The CEO shall be responsible to:

- a) Provide advice to WBC and/or Investigator on any Protected Disclosures that are sensitive in nature and/or serious in its gravity.
- b) Provide advice to WBC or Investigator with regard to investigation or recommend course of action for Protected Disclosures.
- c) Escalate to WBC any Protected Disclosure received from whistleblowers.



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## 5.5 Management Compliance Committee (“MCC”)

The MCC shall be responsible to review, recommend and endorse this Policy for approval by the Board.

## 5.6 Whistleblowing Committee (“WBC”)

5.6.1 The WBC shall be responsible to:

- a) Administer the Policy and ensuring whistleblower has easy access of contacts and provides clear procedures for the reporting of Protected Disclosure by the whistleblowers under this Policy.
- b) Be impartial on all the Protected Disclosures received.
- c) Ensure that whistleblowers are given complete protection under the Policy with identity of the whistleblowers are kept confidential with no unfair treatment or discrimination or harassment or victimization or reprisal be meted out to the whistleblowers, inclusive any direct or indirect use of authority to obstruct the whistleblowers’ rights to continue to perform his/her normal duties and/or from making further Protected Disclosures.
- d) Ensure all Protected Disclosures are attended professionally and confidentially, and recorded properly (inclusive date of receipt, name/particular of the whistleblower, brief contents/allegations of the disclosure, found fit for further action or investigation, or no further action is needed). The whistleblower must receive acknowledgement of Protected Disclosures within 7 working days, together with the name of our contact person and when the whistleblower can expect to receive a response.
- e) Within 7 working days upon receipt of Protected Disclosures, conduct a fact finding or due diligence (i.e. procure details and clarification of the Protected Disclosures), analyze all the information and evaluate the validity of the Protected Disclosures in order to:
  - ◆ Establish if any wrongdoing has occurred, and if so, to what extent;
  - ◆ Minimize the risk of further wrongdoing, to prevent any further loss of assets or damage to reputation;
  - ◆ Protect all sources of evidence to enable thorough investigation being conducted.
- f) Submit a report to CEO and AC Chairman on the conclusion of the fact finding should the Protected Disclosures are concluded as valid with sufficient base to support or found fit for further action under this Policy, inclusive the proposed actions or investigation to be

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undertaken. To submit the report directly to AC Chairman should the Protected Disclosures implicating the CEO.

- g) Submit a report for AC on the result of the actions or investigations undertaken to remedy the Protected Disclosures.
- h) Ensure that all information, documents or reports pertaining to the Protected Disclosures are maintained in a safe, secure and proper manner to retain its confidentiality.

5.6.2 WBC shall comprise of:

- a) Chief Risk Officer;
- b) Chief Internal Auditor;
- c) Chief Human Resource Officer;
- d) Chief Compliance Officer; and/or
- e) Any other personnel at the recommendation of CEO or AC which will be communicated from time to time.

## 5.7 Internal Audit Department (“IAD”)

IAD shall be responsible to:

- a) Conduct investigations for all valid whistleblowing reports. In the event that the IAD is implicated in the report, an external party should conduct the investigation.
- b) Prepare and finalize the investigation report and submit it to the WBC and AC.

## 5.8 Chief Internal Auditor (“CIA”)

5.8.1 The CIA shall be responsible to:

- a) Handle incoming whistleblower reports.
- b) Maintain confidentiality regarding the identity of the whistleblower.
- c) Liaise with the whistleblower on behalf of the WBC, AC or other MCIS party.

5.8.2 Where the position of CIA is vacant for whatever reason, the Chief Compliance Officer (“CCO”) will perform the CIA’s responsibilities under this Policy in the interim.

## 5.9 Compliance Department (“Compliance”)

Compliance shall be responsible to:

- a) Develop, review and maintain the Policy.
- b) Facilitate any revision or strengthening of the Company’s internal controls, policies or guidelines that was affected by or arising from the Protected Disclosures.

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- c) Clearly indicate the parties to whom concerns can be escalated within MCIS.
- d) Communicate to relevant parties on whistleblowing awareness provided in this Policy as well as other avenues for whistleblowing to regulators or law enforcement agencies.
- e) Communicate the Policy to third parties such as contractors, consultants and interns and allow them to report their concerns.
- f) Ensure whistleblowing procedure is available in the Company's website, staff intranet and agency portal.

### 5.10 Whistleblower

The whistleblower shall be responsible to:

- a) Approach in person or write or email directly to any designated person in the following Reporting Matrix for whistleblowing.

<b>Alleged Wrongdoer</b>	<b>Designated Person</b>	<b>Email Address</b>
1. Chairman of MCIS 2. Members of Board (other than Chairman of BAC) 3. CEO 4. CIA <sup>1</sup>	Chairman of BAC	whistleblowing.BAC@mcis.my
Chairman of BAC	Chairman of MCIS	whistleblowing.chairman@mcis.my
1. Members of Executive Management Committee (other than CIA) 2. Employees 3. Agents 4. Partners/Vendors and its staff	Chief Internal Auditor	whistleblowing@mcis.my

Alternatively, the whistleblower may also write to Sanlam Group via email address at [sanlam@tip-offs.com](mailto:sanlam@tip-offs.com) or through online reporting at [www.tip-offs.com](http://www.tip-offs.com). The whistleblower may also call Sanlam Confidential Reporting Hotline, a toll-free number **1 800 816 555**.

- b) Where possible, to provide the following:
  - ◆ His/her full name, contact number and address;
  - ◆ An outline of the known or suspected wrongdoing;

<sup>1</sup> Pursuant to paragraph 5.8.2 in the absence of the CIA, reporting on the CCO shall be sent to Chairman of BAC.

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- ◆ Details, to the best of his/her knowledge, about when, where and how it occurred;
- ◆ A list of the names of those suspected of being involved;
- ◆ A list of the names of anyone who may have relevant information;
- ◆ Details of how he/she came to know about the suspected activities;
- ◆ What, if any, does he/she estimate to be the value of the loss to the Company;
- ◆ What, if any, breaches of internal controls, policy, procedure or other requirements that he/she believe took place;
- ◆ Any specific recommendations he/she has for remedial actions; and
- ◆ The names of anyone (internal and external parties) who he/she has discussed or reported this incident to, inclusive date and time of making such discussion or report (where necessary).

**Note:** For whistleblowers who choose to remain anonymous, while WBC will endeavour to investigate the Protected Disclosures, depending on the gravity of the disclosures, a full and thorough investigation may be impeded if CIA is unable to obtain further information or useful details from the whistleblower.

- c) Assist in the fact finding or investigation and/or appear as a witness, if necessary or required.

**Note:** Should the need arises, the fact that the whistleblower made the original disclosure will, as far as reasonably practicable, be kept confidential and all reasonable steps will be taken to protect the whistleblower from any retaliation, victimisation or detriment as a result of having made a disclosure.

## 6. Guiding Principles & Minimum Standards

6.1 The Policy covers events which have taken place or suspected to take place involving (these events are not exhaustive):

- 6.1.1 Breach of any law or regulation;
- 6.1.2 Criminal offence;
- 6.1.3 Violations or suspected violations of the Anti-Bribery and Corruption Policy or any other of the Company's policies, practices or procedures, employee's Code of Conduct, rules, or corporate governance;
- 6.1.4 Instances of suspected / actual fraud, corruption, bribery, theft, misuse of Company's properties, assets or resources, misappropriation of Company's funds or other forms of dishonest behaviour;
- 6.1.5 Manipulation of Company's data or financial records;
- 6.1.6 Material misrepresentation made by or on behalf of the Company;
- 6.1.7 Non-disclosure on conflict of interest;

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- 6.1.8 Pilferage or stealing or uncontrolled distribution of the Company's confidential information;
- 6.1.9 Abuse of power or authority or mismanagement or misconduct or unfair practice by the directors or Senior Management or Head of Departments / Units / Supports or any employees of the Company;
- 6.1.10 Any activity which is unethical, biased, illegal or detrimental to the financial and/or reputational interest of the Company.

## 6.2 Protection under the Policy

- 6.2.1 Whistleblower is assured of complete protection, such that no unfair treatment or any kind of retaliation, discrimination, harassment, victimization or other form of reprisal will be meted out to whistleblower who acted in good faith.
- 6.2.2 Anyone who retaliates against a whistleblower will be subjected to disciplinary action, which may include termination of employment, demotion or other legal redress.
- 6.2.3 In the event of perceived harassment of the whistleblower by the affected director or employee, he/she may file an application to Chief Human Resource Officer seeking redressal in the matter. The authority would then seek to intervene suitably to protect the whistleblower.
- 6.2.4 Any other person assisting in the investigation of the Protected Disclosures will also be protected in the same extent as the whistleblower.
- 6.2.5 A whistleblower or any person related to the whistleblower who fears or has suffered detrimental action as a result of making a report may request to the Chief Human Resource Officer for relocation of his/her place of employment.
- 6.2.6 The Company will consider the danger or likelihood that detrimental action may be taken against the whistleblower or any related person and shall, as far as practicable, make arrangements for their relocation upon their request.

## 6.3 Confidentiality under the Policy

- 6.3.1 The identity of the whistleblower will be kept confidential.
- 6.3.2 All reports, documents and other information sources which include the identify of whistleblower shall be kept in a secured location, with only the designated personnel as determined by the WBC or AC able to access the information strictly on a need-to-know basis.
- 6.3.3 Exceptional circumstances under which information provided by the whistleblower could or would not be treated with strictest confidentiality are:

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- a) Where the Company are under legal obligation to disclose the information provided;
- b) Where the information is already in the public domain;
- c) Where the information is given on a strictly confidential basis to legal or consultant or law enforcement or auditing professionals for the purpose of obtaining professional advice; or
- d) Where the information is given to the police or other authorities for criminal investigation.

6.3.4 In the event the Company is faced with a circumstance not covered by the above, and where the nature of the investigation or disclosure make is necessary to disclose the identity of the whistleblower, the Company will make every effort to inform or discuss this with the whistleblower before such disclosure is made.

6.4.1 While all Protected Disclosures will be assessed, managed and investigated in a fair and timely manner, the Company may decide to close cases which lack material evidence, particularly where the report originates from an anonymous source and further information cannot be obtained. The AC shall authorise the closure of all cases where an investigation is not conducted.

6.4.2 Should fact finding or due diligence conducted by CIA conclude that the Protected Disclosures have sufficient base or cause to support or found fit for further action, WBC will escalate the matter to the Internal Audit Department to carry out the thorough investigation.

6.4.3 All investigations will be managed internally by Internal Audit. However, external consultant or investigator or investigation team may be appointed should the need arises or where appropriate.

6.4.4 The WBC and/or AC shall immediately notify the Board of any corruption incidents potentially carrying Malaysian Anti-Corruption Commission Act 2009 Section 17A liability.

6.4.5 Further action to remedy the damage or loss, or exert punishment or disciplinary action, arising from the Protected Disclosures will be determined by WBC or AC depending on the conclusion of the investigation.

6.4.6 Should the whistleblower not be satisfied with the investigation process or its conclusion, he/she must write or email directly to the AC Chairman detailing his/her concerns.

6.4.7 The frequency of contacts between the whistleblower and the Investigator will be determined by the availability and clarity of information / documents, nature and gravity of the Protected Disclosures.

## 6.5 Communication

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6.5.1 This Policy should be communicated to all relevant parties to create awareness particularly on the concerns escalation process including other avenues for whistleblowing to regulators or law enforcement agencies through briefing sessions, email blast, Company’s official website, staff intranet, agency portal etc. depending on its suitability.

The whistleblower may raise the concerns to any relevant authorities such as Bank Negara Malaysia (“BNM”), Polis Diraja Malaysia (“PDRM”) and Suruhanjaya Pencegah Rasuah Malaysia (“SPRM”) at the following:

- **Bank Negara Malaysia (BNM)**  
 Pengarah,  
 LINK and BNM Offices,  
 Bank Negara Malaysia,  
 Jalan Dato Onn, 50480 Kuala Lumpur  
 Email: [directorlink\\_wb@bnm.gov.my](mailto:directorlink_wb@bnm.gov.my)
  
- **Polis Diraja Malaysia (PDRM)**  
<https://www.rmp.gov.my/>
  
- **Suruhanjaya Pencegah Rasuah Malaysia (SPRM)**  
<https://www.sprm.gov.my/>  
 Email: [info@sprm.gov.my](mailto:info@sprm.gov.my)  
 Tel: 1-800-88-6000

6.5.2 This Policy should be communicated via Company’s official website to third parties such as contractors, consultants and interns and allow them to report their concerns.

## 7. Monitoring and Reporting Requirements

A complete report (detailing the fact finding, due diligence, investigation, conclusion and remedy actions) will be presented by WBC to the CEO and AC on all Protected Disclosures that have sufficient cause or found fit for further action in a highly professional manner in order to preserve its confidentiality.

## 8. Related Internal Frameworks, Policies and Guidelines

This Policy shall be read in conjunction with the following:

- HR Code of Conduct
- Complaint Handling Policy
- Fraud Control Policy

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- AML/CFT Policy
- Anti-Bribery & Corruption Policy
- Agency Code of Ethics, and all relevant policies and procedure in relation to agency's related matter governed under Business Support Department

**9. Related Regulations and Legislations**

- Whistleblower Protection Act 2010
- BNM Policy Document on Corporate Governance
- BNM Policy Document on Operational Risk Integrated Online Network (ORION)

**10. Deviation**

In the event where there is / are deviation(s) from the established processes or procedures which do not contradict or breach any regulatory requirements, approval from the Board is required.

**11. Compliance with this Policy**

Compliance with this policy is mandatory and breaches shall result in disciplinary action.

**12. Frequency of Review**

This Policy shall be reviewed by Compliance as and when required or at least on an annual basis. Any amendments must be approved by the Board.