

## WHISTLEBLOWING POLICY

### INTRODUCTION

UOB Kay Hian Malaysia Group of Companies (UOBKH) is committed to have a good corporate governance with the establishment of a whistleblowing policy that sets out a transparent and reliable communication channel for legitimate concerns to be raised and objectively investigated and addressed. Any person, external or internal will be able to raise concerns about illegal, unethical or questionable practices in confidence and without the fear of retaliation.

Any person, external or internal is encouraged to report through UOBKH whistleblowing reporting channel about possible Improper Conduct.

“Improper Conduct” means any conduct by any employee, a member of the Board of Directors or independent individual within the Company or Group, which if proved, constitutes a disciplinary offence or a criminal offence, which shall include but not limited to the following:

- (a) breach of provisions of laws or regulations;
- (b) breach of UOBKH’s Code of Ethics and internal policies;
- (c) fraud including misappropriation of funds, assets, theft or embezzlement;
- (d) Corruption, bribery and blackmail;
- (e) Criminal offences under any written law;
- (f) endangerment of an individual’s health and safety;
- (g) abuse of position or information for personal gain; and
- (h) Deliberate concealment of any or a combination of the above.

Improper conduct must be based on reasonable belief supported by facts, and not on speculation, hearsay, or personal dissatisfaction.

The following **DO NOT** constitute Improper Conduct unless it involves legal or ethical violations:

- a) Personal grievances;
- b) Interpersonal conflicts between employees;
- c) Workplace gossip, rumours or unverified allegations;
- d) Frivolous and bogus complaints and allegations.

## **PRINCIPLES**

The principles underpinning the policy are as follows:

- (a) Lodgement and report of Improper Conduct is made in good faith;
- (b) Any person making an allegation of Improper Conduct must have reasonable belief supported by facts that any person has engaged, is engaging or is preparing to engage in Improper Conduct.
- (c) Frivolous and bogus complaints or allegations are strictly prohibited;
- (d) Lodgement and report of Improper Conduct will be treated in strict confidence, fairly and properly;
- (e) The Company will not tolerate harassment or victimization of anyone raising a genuine concern;
- (f) Any individual making a disclosure will retain anonymity unless the individual agrees otherwise;
- (g) The Company will ensure that any individual raising the Improper Conduct is aware who is handling the matter; and
- (h) The Company will ensure no one will be at risk of suffering some form of reprisal as a result of raising an Improper Conduct whether or not it turns out to incorrect.

## **PROTECTION GIVEN**

A whistleblower's rights and protection shall be in accordance to relevant laws provision afforded, such as Whistleblower Protection Act 2010 and/or any provisions of Acts which affords similar or equivalent protection.

## **EXCLUSION FROM PROTECTION**

The Company, however, will revoke this assurance/protection pursuant to Section 11 of the Whistleblower Protection Act 2010 (the Act):

- (a) The Whistleblower has participated in the improper conduct disclosed;
- (b) The Whistleblower wilfully made in his/her disclosure of improper conduct a material statement which he/she knew or believed to be false or did not believe to be true;
- (c) The disclosure of improper conduct is frivolous or vexatious;
- (d) The disclosure of improper conduct is made solely or substantially with the motive of avoiding dismissal or other disciplinary action; or
- (e) The Whistleblower, in the course of making the disclosure or providing further information, commits an offence under the Act.

## **REPORTING CHANNELS**

Any whistleblowing disclosure of improprieties that concerns UOBKH can be made or communicated through the following channels:

- (a) By mailing sealed letter, address to:  
Head of Internal Audit  
UOB Kay Hian (M) Sdn Bhd  
18<sup>th</sup> Floor, Menara Keck Seng,  
203, Jalan Bukit Bintang, 55100 Kuala Lumpur,  
Malaysia.
- (b) By email to: [whistleblowing@uobkayhian.com](mailto:whistleblowing@uobkayhian.com)

## **REPORTING PROCEDURES**

To facilitate an investigation, the following information should be included when making a disclosure of improprieties, where possible and applicable:

- (a) Brief description of the misconduct;
- (b) Date and location of the incidence;
- (c) The identity of the wrongdoer;
- (d) Particular of witness, if any;
- (e) Supporting evidence and/or documents; and
- (f) Other details that is useful and facilitate investigation and action to be carried out.

## **APPROPRIATE ACTIONS TO BE TAKEN**

- (a) All whistleblowing disclosures received must be reported to the Whistleblowing Committee by the person to whom the report / disclosure is directed to.
- (b) The Whistleblowing Committee shall review and determine, on a prima facie basis, as to the validity of the alleged malpractice or improper conduct and assess its severity.
- (c) Upon completion of the review, the Whistleblowing Committee will determine whether it warrants an investigation by the Investigation Team or decide other action steps to be taken.
- (d) The Whistleblowing Committee shall comprise:
  - i) CEO;
  - ii) ARMC Chairman;
  - iii) Head of Internal Audit;
  - iv) Head of Compliance; and
  - v) Such other persons deemed appropriate by the CEO.

## **APPROPRIATE ACTIONS TO BE TAKEN (CONT'D)**

- (e) The Investigation Team led by Head of Internal Audit will be established. The Investigation Team may include other departments within the Group (e.g. Group Internal Audit, Human Resources, Compliance, etc.), as appropriate.
- (f) Upon completion of the investigation, findings and appropriate course of actions will be presented to the Whistleblowing Committee for deliberation.
- (g) Following the conclusion of the investigation, the Whistleblowing Report will be tabled to the Audit and Risk Management Committee (ARMC) no later than the next scheduled meeting.
- (h) In the event that the whistleblowing disclosures received involving management and member of the board of directors, the disclosure will be escalated directly to the ARMC and Group Head of Internal Audit. The ARMC and Group Head of Internal Audit will discuss and determine the next course of actions.
- (i) Depending on the severity of the matter, the ARMC may consider whether to notify the relevant authorities as appropriate.

## **AUTHORITY TO ACCESS RECORDS**

The Investigation Team shall have full and unrestricted access to all information and documents necessary for the investigation.

## **FEEDBACK ON STATUS**

The Whistleblower shall be informed of the conclusion of the investigation and any follow-up actions, provided that the Whistleblower's identity is known.

## **DOCUMENTATION**

The Whistleblowing Report and relevant documents shall be retained for at least 7 years.

## REPORTING PROCESS FLOW

