

WHISTLEBLOWING POLICIES & PROCEDURES

Version 6.0

Authorisation

Version	Date	Amendments/enhancements	Author(s)
1.0	March 2006	New document	Shamla Palany & Mok Kian Tong
1.1	16 Apr 2009	Updated based on recommendation made after AZAP's compliance review.	Shamla Palany/Mok Kian Tong & Malathi Muniandy
2.0	17 May 2013	<ul style="list-style-type: none"> i) Update to reflect changes in Group Compliance Allianz Guideline on Whistleblowing dated December 2012. ii) ii) Format of policies & procedures was realigned to reflect key contents of Allianz Guideline on Whistleblowing. 	Patrick Lim/Derrick Lim/ Manogari Murugiah
3.0	May 2015	<ul style="list-style-type: none"> i) Amendment of paragraph 4.1 for the handling of whistle blowing cases at the Integrity Committee and the Audit Committee – to align with changes in the Integrity Committee Terms of Reference ii) Insertion of 2 new Allianz Group escalation criteria in paragraph 4.2 – to align with AZAP requirements iii) Amendments to the whistle blowing channels in paragraph 5.2 – inclusion of AZAP and Group reporting email and portal. 	Patrick Lim / Malathi Muniandy
4.0	26 November 2020	Review carried out to enhance policy arising from Supervisory Letter recommendation and incorporate provisos in Group Whistleblowing Policy and Bursa Malaysia Listing Requirement that is not in AMB Policy	Compliance
5.0	23 February 2021 & 31 March 2021	Revised escalation process of major cases Changes in flow chart HR related cases	Compliance
5.1	25 April 2022	Update latest reporting violations channel of AZAP and Group (minor editorial changes) under paragraph 5.2	Compliance
6.0	23 November 2022	Amended to align with Allianz Group Standard for Anti-Financial Crime Compliance Policy and Allianz Functional Rule for Anti-Financial Crime Compliance	Compliance

A copy of this Policies and Procedures is also Published in the Company Corporate Website

TABLE OF CONTENTS PAGE

1.0	INTRODUCTION	1
2.0	WHISTLEBLOWING POLICY	1
2.1	SPEAK UP	1
2.2	PROTECTION	1
3.0	SCOPE OF POLICIES & PROCEDURES	1
4.0	HANDLING & ASSESSMENT OF COMMUNICATION	2
4.1	COMMUNICATIONS HANDLING PROCESS	2
4.2	GROUP REPORTING	3
4.3	SAFEGUARDING CONFIDENTIALITY	3
4.4	DOCUMENT RETENTION	3
4.5	DATA PROTECTION AND PRIVACY	3
5.0	WHISTLEBLOWING COMMUNICATION CHANNELS	3
5.1	WHISTLEBLOWING COMMUNICATION	3
5.2	WHISTLEBLOWING COMMUNICATION CHANNEL	3
6.0	AWARENESS PROGRAMME	4
7.0	AUDIT AND REVIEW	4
8.0	NOTICE OF COMMUNICATION	4

APPENDIX I – STANDARD WHISTLEBLOWING HANDLING PROCESS

APPENDIX II –WHISTLEBLOWING HANDLING PROCESS FOR MATTERS MEETING GROUP ESCALATION CRITERIA

APPENDIX III –NOTICE OF COMMUNICATION

1.0 INTRODUCTION

- 1.1 The commercial activities of Allianz Malaysia Berhad (“AMB”) and its subsidiaries, Allianz Life Insurance Malaysia Berhad (“ALIM”) and Allianz General Insurance Company (Malaysia) Berhad (“AGIC”) (collectively called “AMB Group”) is based upon trust. The reputation of AMB Group is based upon the trust which our customers, shareholders, employees and general public have in the performance and integrity of AMB Group. Therefore, it is important that any issues of illegal or questionable activities are reported to management for prompt investigation and intervening action.
- 1.2 The purpose of this document is to ensure that alleged illegal or improper conduct within AMB Group or in the name of an Allianz entity can be addressed appropriately in order to protect Allianz Group, as well as its employees, from the results and effects of illegal or improper conduct.
- 1.3 In this context, whistleblowing is any allegation by an internal or external party in an anonymous or non-anonymous form regardless of the channel of communication relating to possible violation of the Allianz Group Code of Conduct for Business Ethics and Compliance (“Allianz Code of Conduct”), any laws, regulations, order of regulators or any internal rules.
- 1.4 Any communication of concerns by employees of Allianz which are within the scope of these Whistleblowing Policies and Procedures (“Policies and Procedures”) shall be handled and assessed according to the procedures and requirements stipulated herein. Notwithstanding that the main focus of these Policies and Procedures are on employees, the same process in this document will also apply for whistleblowing allegation by any external party or an insurance intermediary.

2.0 WHISTLEBLOWING POLICY

- 2.1 **Speak-Up**
AMB Group encourages its employees and third parties to speak-up and report any possible misconduct they believe to be breach the Allianz Code of Conduct, any laws, regulations, order of regulators or any internal corporate rules.
- 2.2 **Protection**
AMB Group does not tolerate any retaliation against Employees or other internal parties who reports possible concerns under these Policies & Procedures in good faith. Any employee who has engaged in retaliation will be subject to the appropriate disciplinary action, including termination. Equally, AMB Group does not tolerate allegations brought up in bad faith, such as reports intentionally submitted with false information or made maliciously to harm the AMB Group, its Employees or other internal or external parties.

To facilitate investigations, AMB Group employees are encouraged to disclose their identity when performing whistleblowing communication. Their identities will be handled with the highest degree of confidentiality. In a similar manner, any external party that uses the whistleblowing channel for communication of concerns is also encouraged to disclose their identity to facilitate investigations and the same degree of confidentiality as accorded to employees will be exercised.

3.0 SCOPE OF POLICIES & PROCEDURES

- 3.1 These Policies and Procedures apply to communications on any possible misconduct which violates the Allianz Code of Conduct, any laws, regulations, order of regulators or any internal rules (hereafter called “Communication”). Examples of illegal or improper conduct are:
 - a) Fraud or theft;
 - b) Corruption, bribery, inadequate gifts;
 - c) Antitrust violation;

- d) Financial irregularities or breaches of accounting or tax provisions. Falsification and/or manipulation of AMB Group business and/or financial records;
 - e) Regulatory breaches;
 - f) Any kind of discrimination and sexual harassment (e.g., sexual harassment, mobbing or bullying);
 - g) Any possible criminal offenses; or
 - h) Any possible violation of the Allianz Code of Conduct.
- 3.2 For avoidance of doubt, communication of human resource complaints, employee disciplinary issues and employee related grievances are excluded from these Policies and Procedures. If such a communication is received from an employee (named & not anonymous), the following will apply: -
- (i) Inform the employee that the case is assessed as HR related & if the employee agrees/consent, the case will be forwarded to HR for necessary action; and
 - (ii) If the employee does not agree to the transfer of case to HR, depending on provided reasons it should be analyzed whether complaint qualifies as a compliance case and if not, depending on the content escalated to relevant function or closed (in this case it should be explained to employee the reasons)

4.0 HANDLING AND ASSESSMENT OF COMMUNICATION

4.1 Communication Handling Process¹

- 4.1.1 All whistleblowing communication is to be handled and coordinated by Compliance Department. Compliance Department's responsibilities with respect to whistleblowing communication are as follows:
- a) Acknowledge, assess, investigate and monitor all whistleblowing communication promptly, professionally, fairly and diligently;
 - b) Report whistleblowing communication to the Integrity Committee ("IC"), Audit Committee ("AC") and in certain instances, Allianz Group Compliance (See Group Reporting Criteria in paragraph 4.2.1);
 - c) Any whistleblowing case alleging a violation of antitrust law is immediately referred to AMB Legal Department (Anti-Trust Coordinator) as well as Group Legal. For further details, please consult AMB Legal Department or refer to the Allianz Minimum Standard for Antitrust Compliance.
 - d) Ensure whistleblowing communication channels and processes in these Policies & Procedures are implemented; and
 - e) Providing guidance, training and advice to management and departments of AMB Group.
- 4.1.2 Upon receiving a whistleblowing communication, the designated Compliance Officer in Compliance Department shall review the communication and act promptly and objectively to investigate allegations of misconducts. Affected function or employee must have the opportunity to answer to the allegations as part of the investigation process. The designated Compliance Officer shall conduct the investigation in accordance to the AMB Internal Investigation Protocol and must observe all relevant laws and regulations (e.g. Data Privacy). Investigation results must be based on evidence via lawful methods, respecting the applicable rules of the respective jurisdictions.
- 4.1.3 Prior to any kind of decision on disciplinary measures, the alleged or involved employee should have the opportunity to respond to the allegations. The meeting should be held with the involvement of the responsible HR representative and the person responsible for the investigation.
- 4.1.4 The results of all whistleblowing investigations and Compliance Department's recommendations must be presented to the AMB IC in a report.
- 4.1.5 The IC then deliberates on the whistleblowing report; and decides on the appropriate actions to be taken. Communication of the IC's decisions to the relevant parties will be performed by the IC's Chairperson or the Secretary. All whistleblowing incidents and findings are to be reported to the AC for closure purposes. For cases which could have a material impact, the IC shall seek the AC's approval prior to taking any appropriate action.

¹ The Compliance officer takes responsibility for these tasks.

- 4.1.6 If the allegation made in the Communication proves to be unfounded, but raises a general business issue, the IC's report shall state that there is no misconduct but may nevertheless require the responsible management to address such business issue and the affected party should be notified.
- 4.1.7 A diagrammatic view of the whistleblowing handling process is depicted in **Appendix I** and **Appendix II** of the Policies and Procedures.
- 4.2 Group Reporting**
- 4.2.1 There should be immediate escalation to Audit Committee (AMB), Regional Compliance and Allianz Group Compliance (via immediate reporting of the case in Compliance Cases Management Tool and e-mail) if any communication meets the criteria below:-
- i) Cases involving local Chief Executive Officer (CEO), Chief Financial Officer (CFO), any other executive reporting directly to the Board of Directors of the AMB Group or other local safeguarding function (e.g. Compliance, Risk, Internal Audit, Legal and Financial Control);
 - ii) Any case of potential corruption on local level (no threshold);
 - iii) Discrimination, harassment or any other activity which all may have a serious impact on the reputation of the AMB Group;
 - iv) Cases relating to physical threat, extortion/blackmailing or any other similar serious issue relating to personal safety;
 - v) Intentional misstatement of local financial statements;
 - vi) Alleged antitrust violations such as agreements between competitors with the object of fixing premiums or terms and conditions, limiting capacities, products or sales or allocating territories, products or customers; bid-rigging and non-compete commitments;
 - vii) Suspected fraud involving any violation of international legal requirements by AMB Group; and
 - viii) Suspected fraud involving any reputation risk to AMB Group or the Allianz Group
- 4.2.2 For whistleblowing communication not falling under the definition above, they are reported as standard cases in the Allianz Group Compliance Case Management Tool (CCMT) not later than within the month that they became known to the Compliance function. For avoidance of doubt, if Compliance receive the case during weekend/ public holiday within the month. the case shall be reported to CCMT on the next working day.
- 4.3 Safeguarding Confidentiality**
All Communication must be handled confidentially and may be disclosed only on a strictly Need-to-Know basis. Investigation results are of a strictly confidential nature and must be handled as such.
- 4.4 Document Retention**
All information with respect to whistleblowing communication and its handling must be retained in accordance to the AMB Group's document retention policy.
- 4.5. Data Protection and Privacy**
Applicable relevant laws and regulatory provisions, for example data protection and privacy laws must be complied.

5.0 WHISTLEBLOWING COMMUNICATION CHANNELS

- 5.1 Whistleblowing Communication**
Employees of the AMB Group may raise concerns or complaints anonymously or non-anonymously.
- 5.2 Whistleblowing Communication Channel**
The following channels are available to AMB Group employees for communicating whistleblowing concerns:
- i) Trusted direct manager;
 - ii) Senior management member of AMB Group;
 - iii) Group Head of Internal Audit Department;
 - iv) Group Head of Human Resources Division;
 - v) Group Head of Legal;
 - vi) AMB AC members;

- vii) AMB Compliance Department pigeon hole at mailing room;
- viii) Anonymous AMB Group Compliance Officer email: compliance.officer@allianz.com.my; (see details on 5.3);
- ix) AZAP Compliance e-mail: azapcompliance@allianz.com.sg;
- x) AZAP Compliance portal: [Allianz Asia Legal & Compliance | Allianz Connect](#);
- xi) Group Compliance e-mail: compliance@allianz.com;
- xii) Group Compliance portal: [Group Compliance | Allianz Connect](#); and
- xiii) Group Speakup@Allianz: [SpeakUp@Allianz tool in English](#).

Except in the case of conflicts of interest involving the relevant Compliance Function, all members of senior management, Group Heads of AMB Group as mentioned above and any other Managers are obliged to forward any information and/or notification made by an Employee/external party directly to Compliance in a confidential manner and without undue delay.

- 5.3 Any external party intending to lodge a Whistleblowing communication may do so by sending email to compliance.officer@allianz.com.my and this will be clearly reflected in the Allianz Malaysia Website (Contact Us). This email account is accessible by Chairman of Audit Committee, Head of Compliance of AMB, AGIC and ALIM, and manager of Investigations.
- 5.4 Alternatively, the Whistleblower may write directly to the relevant regulatory authorities as prescribed by the Whistleblower Protection Act 2010 including but not limited to Bank Negara Malaysia, Royal Malaysia Police (Polis Diraja Malaysia) and Malaysian Anti-Corruption Commission.

6.0 AWARENESS PROGRAMME

- 6.1 To raise awareness of the Whistleblowing Policies & Procedures and avenues for reporting, Compliance Department shall conduct awareness programmes to AMB employees on a periodic basis to ensure effective implementation of these Policies and Procedures.

7.0 AUDIT AND REVIEW

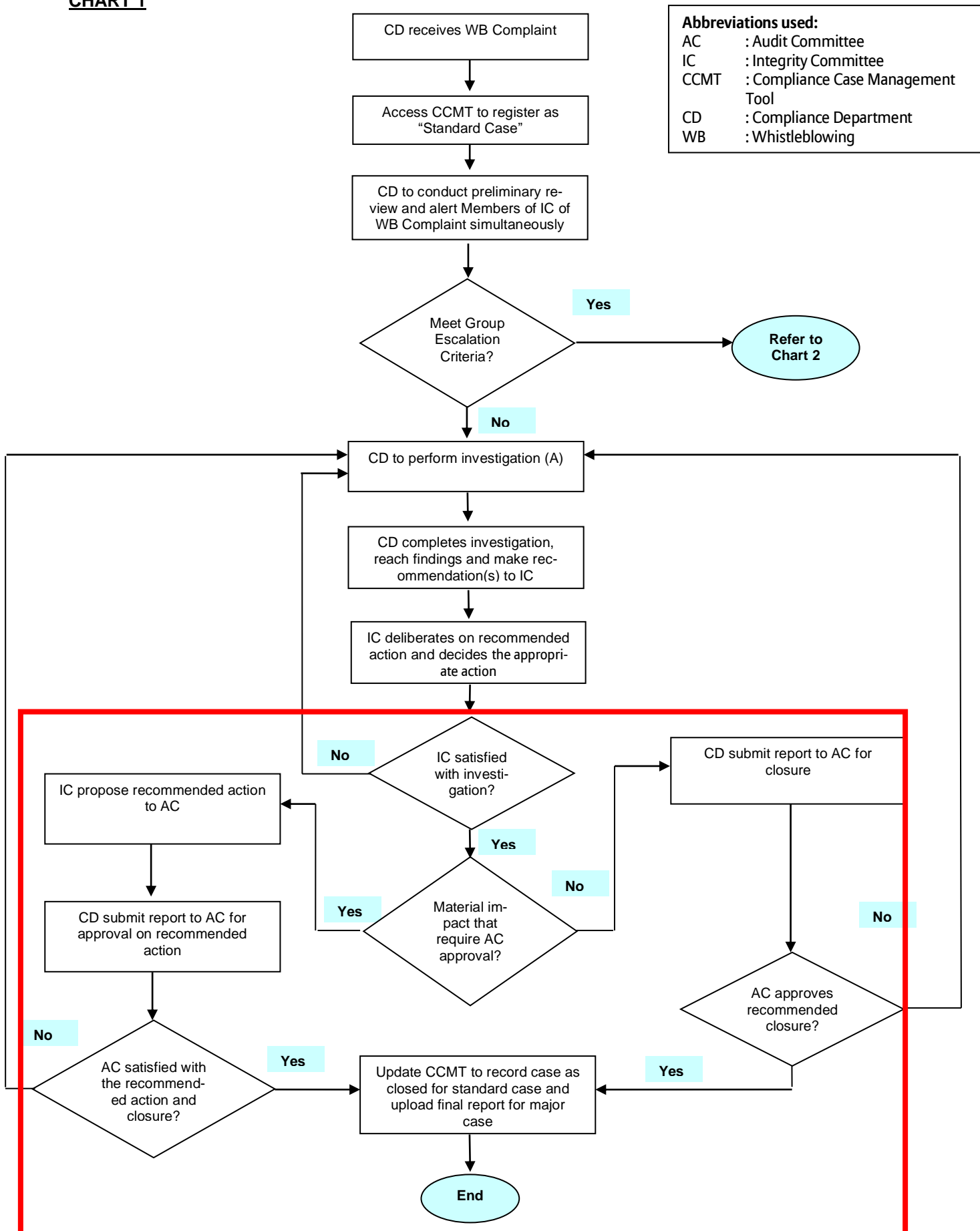
- 7.1 This Policy and Procedure is required to be reviewed periodically to assess the effectiveness, at least once every 3 years or as and when there is a change in the law, regulations, Allianz Group Standard and Functional Rules.

8.0 NOTICE OF COMMUNICATION

- 8.1 Whistleblowing communication under these Policies and Procedures may be made using the prescribed form in **Appendix III**.

APPENDIX I : STANDARD WHISTLEBLOWING HANDLING PROCESS#1

CHART 1

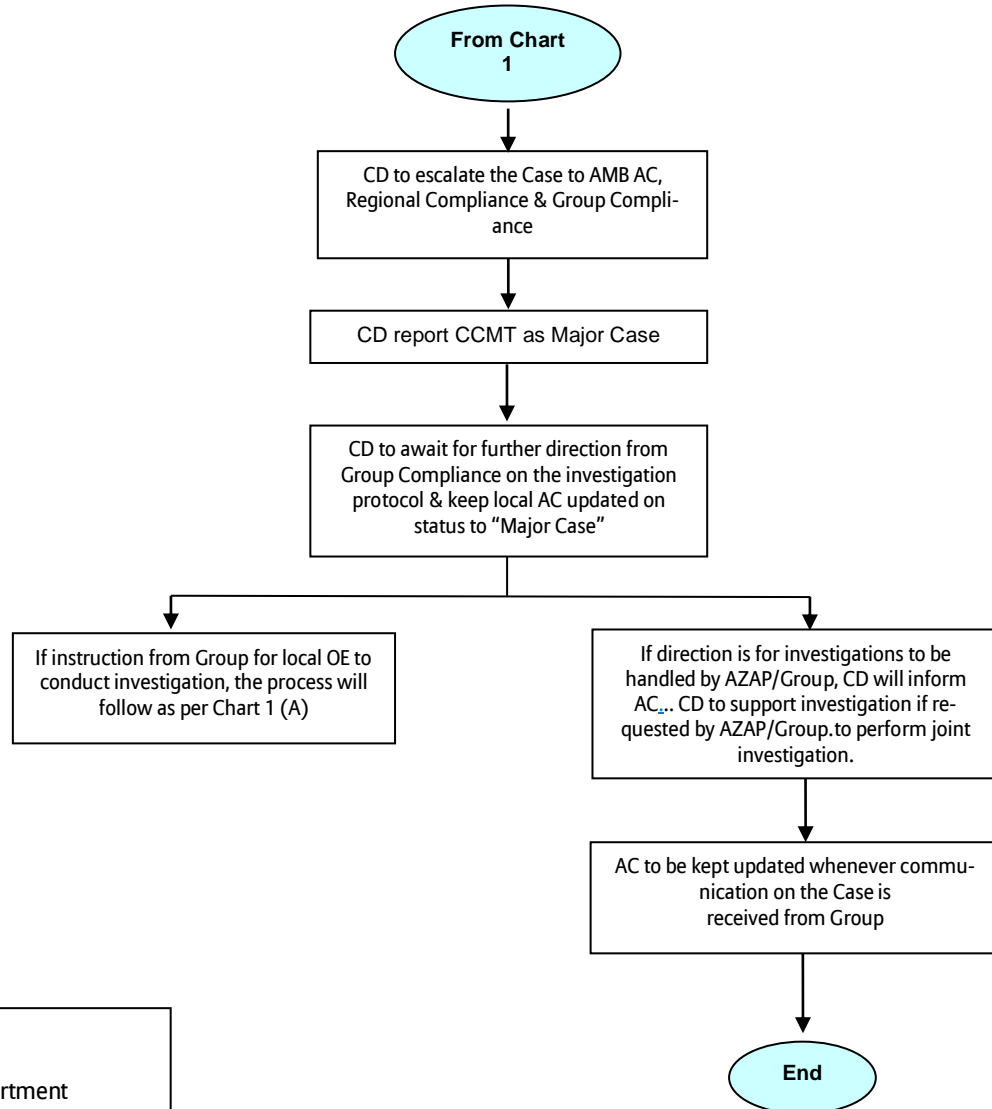


Abbreviations used:
 AC : Audit Committee
 IC : Integrity Committee
 CCMT : Compliance Case Management Tool
 CD : Compliance Department
 WB : Whistleblowing

APPENDIX II : WHISTLEBLOWING HANDLING PROCESS FOR MATTERS MEETING GROUP ESCALATION CRITERIA

CHART 2

WHISTLEBLOWING HANDLING PROCESS FOR MATTERS MEETING GROUP ESCALATION CRITERIA



Abbreviations used:
 AC : Audit Committee
 CD : Compliance Department

APPENDIX III : NOTICE OF COMMUNICATION

1. NATURE OF THE ALLEGED IRREGULARITIES

Please describe the nature of the alleged irregularities and provide any supporting findings or documentary evidence:

2. INFORMATION ABOUT PERSONS INVOLVED

Please fill in the names of all persons allegedly involved in the alleged irregularities, as well as the names of persons who can provide additional insight to enable a full and complete investigation into the matter:

3. COMMUNICATIONS

Please describe any other communications that have taken place with regard to the alleged irregularities:

4. BUSINESS CONTACT INFORMATION

Please provide any information you deem necessary or helpful:

We encouraged whistleblower to provide contact details for us to ascertain the facts or to obtain further information for investigation purposes.

To use separate sheet if necessary
