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**HONG LEONG CAPITAL BERHAD  
WHISTLEBLOWING POLICY**

**1. Purpose**

To provide an avenue for employees of Hong Leong Capital Berhad (“HLCB”) and any other person to raise genuine concerns about any improper conduct or wrongful act (“**Improper Conduct**”) in relation to HLCB through HLCB whistleblowing channel on a confidential basis.

**2. Application of Policy**

The following persons may raise any genuine concerns about any Improper Conduct vide HLCB whistleblowing channel:

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

**3. Policy Statement**

HLCB is committed to good business ethics and integrity as set out in the HLCB Code of Conduct and Ethics. All persons are encouraged to raise genuine concerns about Improper Conduct involving HLCB at the earliest opportunity, and in an appropriate way, through available channels under this Whistleblowing Policy.

**4. Types of Concerns That May Be Raised**

4.1 You should raise any genuine concerns about any Improper Conduct occurring within HLCB and/or that may adversely impact HLCB, including but not limited to:

- Any criminal offences, including fraud, corruption, bribery and blackmail;
- Any misappropriation or misuse of funds or assets, theft or embezzlement;
- Any financial irregularity or impropriety;
- Any failure to comply with legal or regulatory obligations;
- Any breach of HLCB’s Code of Conduct & Ethics or Improper Conduct which would be a disciplinary offense; or
- Any gross mismanagement of company affairs.

4.2 Please note that any grievance of a personal nature or that related to your employment should be raised through HR grievance procedures and not through this Whistleblowing Policy or the Whistleblower Form.

4.3 Any genuine concerns on Improper Conduct occurring in and/or affecting the subsidiaries of HLCB shall be raised vide the respective whistleblowing channels in the relevant subsidiary of HLCB, and not through HLCB’s whistleblowing channel. However, where the genuine concern relates to Improper Conduct concerning the designated recipient (eg: BARMC) of a whistleblowing report in that subsidiary of HLCB, such genuine concern shall be raised through the HLCB’s whistleblowing channel.

## 5. Who To Raise Concerns To

Reports of any such genuine concerns may be made to:

### **Chairman of the Board Audit & Risk Management Committee**

Hong Leong Capital Berhad  
Level 28, Menara Hong Leong,  
No. 6, Jalan Damanlela,  
Bukit Damansara,  
50490 Kuala Lumpur  
*E-Mail:* [BARMCChairman@hlcap.hongleong.com.my](mailto:BARMCChairman@hlcap.hongleong.com.my)

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](#) to provide the details required.

HLCB reserves the right not to investigate any alleged Improper Conduct which are raised anonymously.

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 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 HLCB's board of directors, Head of Internal Audit and the investigation team in order to follow up and, if appropriate, act on your complaint, or where required by law or regulatory authorities. Your personal information 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 requested to assist when more information is needed during the investigation of the alleged Improper Conduct.

## 9. Interpretation

*“BARMC”* refers to HLCB’s Board Audit and Risk Management Committee;

*“Board of Directors”* refers to HLCB’s Board of Directors;

*“HLCB”* refers to Hong Leong Capital Berhad;

*“Improper Conduct”* has the meaning set out in paragraph 1 and includes the list set out in paragraph 4.1.