PACIFIC & ORIENT INSURANCE CO. BERHAD
WHISTLEBLOWING POLICY

Purpose

To encourage employees or external parties to disclose any malpractice or misconduct (whistleblowing) of which they become aware and to provide protection for employees or external parties who report allegations of such malpractice or misconduct.

Scope

The Whistleblowing Policy applies to all employees and external parties, including but not limited to full-time and part-time employees, contract employees, consultants, suppliers, service providers, agents and policy holders of the Company.

Policy

The Whistleblowing Policy is designed to encourage employees or external parties to report alleged malpractice or misconduct, to ensure that all allegations are thoroughly investigated and suitable action taken where necessary.

Any whistleblowing employee is protected against adverse employment actions (discharge, demotion, suspension, harassment, or other forms of discrimination) for raising allegations of malpractice or misconduct. Employees who participate or assist in an investigation will also be protected. Every effort will be made to protect the anonymity of the whistleblower; however there may be situations where it cannot be guaranteed.

However, this policy does not protect the person making the report from the consequences being involved in any improper conduct or unlawful activity alleged in a complaint under the policy. For those whistleblower who report in bad faith or based on unfounded allegations or containing trivial, malicious, slanderous, and frivolous or vexations claims may be subject to appropriate action.

Below are some examples of malpractice or misconduct:

- A criminal offence
- Misleading or deceptive conduct of any kind
- Intentional misrepresentations directly or indirectly affecting financial statements
- A failure to comply with any legal obligations
- A miscarriage of justice
- Danger to the health and safety of any individual
- A serious breach of fundamental internal control
- Breach of Company’s policies, practices, procedures or other rules of conduct
- Breach of confidentiality obligations
A. **Procedures for Employees**

1. **Reporting**

   An employee who reasonably believes that inappropriate practices or conduct are occurring should raise the issue with his/her Head of Department. If the employee is not comfortable in reporting to his/her Head of Department, the malpractice or misconduct should be reported to a Designated Executive listed in Appendix A. It will be the responsibility of the Designated Executive to initiate the enquiry. To preserve anonymity, the whistleblower is not restricted to reporting the issue to the Designated Executive and may choose to report directly to the Chief Executive Officer ("CEO") or any Director of the Company instead.

   If the employee believes that there are inappropriate practices or conduct involving the CEO, he/she should report such matter to the Board directly.

   The CEO will report to the Board all incidences of whistleblowing reported to a Designated Executive.

2. **Investigation**

   Once the claim of malpractice or misconduct is made, the Head of Department or Designated Executive will respond to the whistleblower within 10 working days, setting out the intended investigation plan. An investigation may include internal reviews, reviews by external auditors, lawyers or some other external body.

   Once the investigation is completed, the Designated Executive from the Company will inform the whistleblower of the results of the investigation as well as any corrective steps that are being taken.

   Employees who believe they are being penalised in any way for whistleblowing or who believe that there has been cover up of the action disclosed or who do not consider that they have a satisfactory response to their disclosure should write to the Board with the facts.

3. **Safeguards**

   All reasonable steps will be taken to protect the anonymity of the whistleblower. However, under certain circumstances to assist with the investigation, the individual’s identity may become known or needs to be revealed.
4. **Disciplinary Action**

If the claim of malpractice or misconduct is substantiated, appropriate disciplinary action will be taken against the responsible individual(s), up to and including termination of employment or terminate the supply of goods and services.

Any act of retaliation or victimisation against the whistleblower will result in disciplinary action, up to and including termination of employment.

However, the malicious use of the Whistleblowing Policy may result in disciplinary action against the whistleblowing complainant, up to and including termination of employment.

B. **Procedures for External Parties**

1. **Reporting**

An external party who reasonably believes that inappropriate practices or conduct are occurring should raise the issue with the CEO or Director. It will be the responsibility of the CEO or Director to initiate the enquiry.

All incidences of whistleblowing have to be reported to the Board by the CEO.

2. **Investigation**

Once the claim of malpractice or misconduct is made, the CEO will respond to the whistleblower within 10 working days, setting out the intended investigation plan. An investigation may include internal reviews, reviews by external auditors, lawyers or some other external body.

Once the investigation is completed, the CEO will inform the whistleblower of the results of the investigation as well as any corrective steps that are being taken.

External parties who believe they are being penalised in any way for whistleblowing or who believe that there has been a cover up of the action disclosed or who do not consider that they have had a satisfactory response to their disclosure should write to the Board with the facts.

3. **Safeguards**

All reasonable steps will be taken to protect the anonymity of the whistleblower. However, under certain circumstances to assist with the investigation, the individual’s identity may become known or needs to be revealed.
4. **Disciplinary Action**

If the claim of malpractice or misconduct is substantiated, appropriate disciplinary action will be taken against the responsible individual(s), up to and including termination of employment or terminate the supply of goods and services.

Any act of retaliation or victimisation against the whistleblower will result in disciplinary action, up to and including termination of employment or terminate the supply of goods and services.

However, the malicious use of the Whistleblowing Policy will result in appropriate action against the whistleblowing complainant, up to and including the termination of the supply of goods and services.

**Others**

A process flowchart is also enclosed for ease of reference. Please refer to Appendix B.

**Appendix A**

Designated Executive

- Chief Operating Officer
- Chief Audit Executive
WHISTLEBLOWING FORM
(* Denotes mandatory field

Your Contact Information

Name* ____________________________________________

NRIC No.* _______________________________________

Phone No.* Office_______Mobile_________Home________

Email address* __________________________________

Employment details* _________________________________

Position & department
(For employees only)

Your Disclosure*

Please include details of the person(s) involved, nature of allegation, where and when the alleged improper conduct took place (use additional sheets if necessary)

Please state the supporting documents, witnesses or evidence to substantiate your disclosure (if any) to facilitate investigation. You may also attach the relevant documents (use additional sheets if necessary)

Declaration*

I hereby declare that all the information given herein are made voluntarily and are true to the best of my knowledge and I will ensure that my participation in this matter will be kept confidential. I do understand that the Company will use the information and material provided throughout the investigation process.

(Signature*)

Name

Date*
WHISTLEBLOWING PROCESS FLOWCHART

Appendix B

Receipt of whistleblowing form/report by Chief Executive Officer or Director.

Chief Executive Officer or Designated Executive to meet with Whistleblower and hear the complaint.

INVESTIGATION REQUIRED
Team to be nominated, Chief Executive Officer and/or Designated Executive + 1 Manager.
Report to be submitted to the Board upon completion of investigation.

Chief Executive Officer to report to the Board.

Outcome letter sent to Whistleblower.

Chief Executive Officer to ensure appropriate actions taken against the responsible individuals as a result of whistleblowing complaint.

Case closed.

NO INVESTIGATION REQUIRED
Outcome Letter sent to Whistleblower.

Case closed.