



WHISTLEBLOWER POLICY

**AXA AFFIN
GENERAL INSURANCE BERHAD**

Version 5.1
17 August 2018

**Document Approval**

Approval Committee	Title	Date
Local Management Audit & Compliance Committee (LMACC)	Regional Whistleblower Policy	18 August 2016
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Version History

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4.0	13 June 2016	Farah Sofia Azmi/ Ang Chee Kiang/ Aisah Bevi	Compliance Department / Chief Legal & Claims Officer
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Appendix A – AAGI Designated Complaint Recipient

For further information about any aspect of this Policy, you could contact either the nominated Designated Complaint Recipient in AAGI, or the AXA Group Designated Complaint Recipient.



1. Objective

- 1.1. The objective of this AXA Affin General Insurance Berhad (‘hereafter, “AAGI”) Whistleblower Policy (‘Policy’) is to:
- support the reporting of suspected instances of improper practices or behaviour which may implicate the ethical standards or integrity of AAGI and that normal investigative and/or complaint handling procedures are not considered adequate; and
 - outline the mechanisms and infrastructure in place within AAGI for the reporting and investigation of matters raised by a Whistleblower; and
 - outline the measures in place to protect employees against reprisal or recriminatory action from within the organization.

2. Scope and Coverage

- 2.1. This policy applies to all employees (including fixed term and temporary workers) of AAGI, and third parties (includes but not limited to interns, contractors, suppliers, consultants etc)
- 2.2. This policy provides assurance that such information from the whistleblower will be treated in strict confidence without risk of reprisals on the whistleblower

3. Types of Misconduct

- 3.1. Misconduct can take many different forms but for ease of data analysis and to allow comparability between sites, AAGI uses eight generic types of misconduct:
- 3.1.1. Human resources matters (*including harassment, discrimination, inadequate behaviour at work and/silky or any potential breach of local Labour Law*)
 - 3.1.2. Misappropriation of assets (*including theft; misuse or abuse of company assets such as phone, computer, funds; data leakage etc.*)
 - 3.1.3. Financial statement fraud (*misrepresentation, falsification, concealment, misstatement or omission of financial records*)
 - 3.1.4. Other fraudulent statement (*i.e., related to non-financial management information such as HR, strategic, commercial, asset management, etc.*)
 - 3.1.5. Corruption, bribery, extortion (*including gift, commission, political contribution, conflict of interest etc. that are not compliant with GSH, INM Compliance and Ethics Guide's and/or any local legislation*)
 - 3.1.6. Other breach of applicable laws or regulation (*including unfair competition / anti-trust, insider trading, Money laundering and financing terrorism*)
 - 3.1.7. Endangering health, life and/or safety
 - 3.1.8. Customer mistreatment

This list is simply to facilitate reporting of the events in a consistent manner across AXA Group entities; it is not intended that this list be considered as a comprehensive list of subjects upon which whistle-blowing events can be made. If it is not clear which category a report should fall into then guidance should be sought from the relevant Designated Complaint Recipient.



4. Roles and Responsibilities

- 4.1. In accordance to the Corporate Governance policy issued by BNM, AAGI is required to designate a non-executive director to be responsible for the effective implementation of the policy. In this regard, the designated non-executive director will be the Chairman of Audit Committee.
- 4.2. AAGI is responsible to nominate a Designated Complaint Recipient ('DCR') to receive and handle any reports of misconduct. The most senior internal auditor in the entity will be appointed as the DCR. (Please refer to Appendix B).
- 4.3. The DCR is required to:
- Keep up to date and comply with AAGI and AXA Group requirements (please refer to Group Standard) with regard to whistle-blowing.
 - Handle any alleged misconduct reports with the upmost confidentiality.
 - Maintain a log of all reported cases that notes their status and the person in charge of the case; ensure that this record is secured and retained in accordance with any local legal or regulatory requirements; with the retention policy documented and adhered to.
 - Escalate and provide summary reporting on whistle-blowing in line with Regional requirements.
- 4.4. The local Head of Compliance is required to:
- Keep up to date and comply with AAGI and AXA Group requirements with regard to Whistleblowing.
 - Establish the local Whistleblowing policy in line with local legal and regulatory requirements and ensure that it is kept up to date and in compliance with local requirements.
 - Ensure that the local process to escalate suspected staff misconduct issues is documented and publicised so that all members of staff (including temporary staff) have access to it.
 - Ensure that all members of staff (including temporary staff) are able to use the process as described.
 - Ensure that those functions that may typically be expected to receive formal allegations of misconduct (i.e. CEOs office, Human Resources, Legal & Compliance, Fraud, Risk Management, Internal Audit) are aware of the need to pass to the DCR any and all reports of misconduct.

5. Whistleblower Reporting and Escalation Process (Employees of AAGI)

- 5.1. Any member of AAGI staff is encouraged to directly raise the issue to the local DCR. AXA Group enables Whistleblowers to report the suspected instant through:
- Speaking with the local DCR (refer to Appendix A); or sending an email to the Group directly via

AXA Group's Whistleblower Hotline
Speak-up@axa.com



- 5.2. There is no specific format required for the Whistleblower Report, but the report should include sufficient information to allow investigation to be conducted, such as:
 - The name of the concerned party(ies)
 - Sufficient details of the incidence with supporting materials, if any
 - Contact details (e.g. an email address or telephone number) for the DCR to follow-up.
- 5.3. Should a Whistleblower wish to remain anonymous it is important that they provide either enough information to facilitate a thorough investigation into the matter(s) being raised or anonymised contact details (e.g. email address) for follow-up.
- 5.4. The Whistleblower should make the report in good faith and have reasonable grounds to suspect the information he/she is reporting indicates misconduct occurred. ***Deliberate false reporting will not be tolerated, and anyone found making a deliberate false report will be subjected to disciplinary action, which could include dismissal.***
- 5.5. DCR will have direct and unrestricted access to financial, legal and operational assistance when this is required. All employees of AAGI are required to co-operate in investigations.
- 5.6. Under certain circumstances, the member of staff may be contacted for additional information to clarify the notification made.
- 5.7. Any individual who is the subject of an allegation and is under investigation should be given a fair opportunity to respond to the allegation, if appropriate. The person who is whistle-blown against must not be notified of the allegation against them until such time that this has been approved by the relevant local Head of Internal Audit.
- 5.8. Confidentiality must be ensured at all times and every reasonable efforts must be taken to keep the Whistleblower's identity confidential. This is critical in ensuring that no reprisal or recriminatory action is taken against the Whistleblower. Revealing the existence of an investigation or details contrary to this policy could result in disciplinary action.

6. Whistleblower Reporting and Escalation Process (Third Parties)

- 6.1 Any third party (includes but not limited to contractors, consultants, interns and etc.) is allowed to report their concerns directly to the local DCR through:
 - Contacting the DCR (refer to Appendix A)
- 6.2 The reporting and escalation process is the same as the process described in Section 5 of this policy



7. Whistleblower Recording Process

- 7.1. Upon receipt of a suspected misconduct notification the DCR should log it, record the time and date when it was received and allocate it a unique sequential reference number.
- 7.2. The preliminary analysis of the case (or triage) should be systematically documented including rationale(s) leading to a conclusion. The DCR should also document his/her recommendation and opinion sought, as to whether to investigate the matter or not and, if to be investigated, to whom they recommend that the matter should be passed for investigation.
- 7.3 The DCR should determine who within the entity is appropriate to inform of the notification before any investigative work is performed. A record of who has been informed and when should be maintained. The results of the investigation should be formally documented as soon as practicable; allowing appropriate parties to question the findings before the case is concluded upon. The outcome should be recorded in the whistleblowing log.

8. Reporting Process to the Management and Relevant Audit Committees

- 8.1. A final Whistleblower Case Report with finding and recommendation (e.g. disciplinary actions and/or new controls/process enhancement required) will be submitted to the CEO for his/her review and approval (local and/or Regional CEO depending on the nature of the whistleblowing incident), a copy should also be provided to the Regional DCR (unless prohibited by local law) who will decide if the case needs further escalation to Regional or Group CEOs.
- 8.2. Any Whistleblowing alleging falsification of accounting records, fraud by a member of the local EXCOM, or any inappropriate behaviour by a “fit and proper” individual (refer to Group Standard on Fit & Proper) must be reported to the Group General Counsel within 3 working days of receipt.
- 8.3. A summary of the received whistleblowing incidents will be compiled by the DCR and tabled at relevant audit committees (i.e. local Management Audit and Compliance Committee (“LMACC”) and/or local Board Audit and Compliance Committee (“LBACC”) and/or Regional Management Audit and Compliance Committee (“RMACC”)) for their review.

9. Communication of the AAGI Whistleblower Policy

- 9.1. This policy will be reviewed annually by local Compliance function and should be approved for adoption by either the local Board, the local Board Audit Committee (“AC”) or the local Management Audit and Compliance Committee (“LMACC”) if any amendments are made.
- 9.2. The policy should be saved in database/network shared drive/local intranet, etc. and made available to all AAGI employees. Responsibility for communicating the policy and ensuring all employees are able to use the whistleblowing process will be managed by Compliance function.
- 9.3. Entity Compliance should ensure appropriate annual reminder communications should be sent to all staffs.



AAGI DESIGNATED COMPLAINT RECIPIENT

Appendix A

(Last updated on: 12 July 2018)

You can send the Whistleblower Report directly to:

Location	Title	DCR Contact details
Malaysia – AXA AFFIN General Insurance Berhad	Vice President Internal Audit	vivian.ho@axa.com.my +603-2170 8395

OR

AXA Group Whistleblow hotline Speak-up@axa.com
