

WHISTLEBLOWING POLICY

CGS-CIMB GROUP WHISTLEBLOWING POLICY			
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REFERENCE	:	01-00-01	EFFECTIVE DATE : 22 JULY 2019
			SUPERSEDES :

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CGS-CIMB GROUP WHISTLEBLOWING POLICY			
SECTION 1	:	INTRODUCTION	
SUB-SECTION	:	Objective of this Policy	
REFERENCE	:	01-00-01	EFFECTIVE DATE : 22 JULY 2019
			SUPERSEDES :

1. INTRODUCTION

1.1 Purpose / Objective

The purpose of the CGS-CIMB Group (“CGS-CIMB” or the “Group”) whistleblowing policy would be as follows:

- a) Provide avenues to employees and third parties to disclose information relating to any wrongdoings, malpractices and/or irregularities discovered in good faith.
- b) Encourage all employees to be vigilant about the on-goings of the Group’s immediate operating environment.
- c) Stipulates the rights and protection that is accorded to the employees for disclosing such information.

1.2 Interpretation

Unless otherwise expressed to the contrary, words imparting the singular shall include the plural and vice versa and words imparting the masculine gender shall include the feminine and neuter genders and vice versa.

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SECTION 2	:	APPLICABILITY	
SUB-SECTION	:		
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2. APPLICABILITY

- 2.1 This policy and procedure is applicable to all entities within the Group.
- 2.2 This policy applies to all matters involving the Group's employees and any other stakeholders/persons providing services to the Group, including consultants, vendors, independent contractors, external agencies and/or any other party with a business relationship with the Group.

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SECTION 3	:	POLICY	
SUB-SECTION	:	Preamble	
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3. POLICY

3.1 Preamble

3.1.1 As part of good corporate governance, CGS-CIMB will establish a whistleblowing policy that sets out avenues for legitimate concerns to be objectively investigated and addressed. Individuals will be able to raise concerns about illegal, unethical or questionable practices in confidence and without the risk of reprisal. To this end, CGS-CIMB will:

- a) clearly indicate the parties to whom concerns can be escalated within the Group and ensure that individuals are also made aware of other avenues for whistleblowing to regulators or law enforcement agencies;
- b) communicate the whistleblowing policy to all parties and allow them to report their concerns.

3.1.2 It is the implied duty of all employees who are aware of any wrongdoing committed by any parties within the Group to report the matter to the relevant channel stated in this policy. An employee who fails to do so may be charged with aiding/abetting the perpetrator of the misconduct and will be subjected to appropriate disciplinary action.

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SECTION 4	:	SCOPE OF POLICY	
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4. SCOPE OF POLICY

4.1 Definition of whistleblowing

4.1.1 The act of whistleblowing may relate to any information pertaining to any wrongdoings, malpractices, and/or irregularities as per the following list which is inclusive of, but not limited to, the following:

- Any unlawful act, whether criminal or breach in civil law;
- Breach of policies and/ or procedures;
- Fraud, corruption, misappropriation or dishonesty;
- Actions which can cause physical danger/harm to another person and/or can give rise to risk of damage to properties/ assets;
- Forgery or alteration of any documents belonging to CGS-CIMB, customers, another Financial Institution, or agents of CGS-CIMB;
- Profiteering as a result of insider knowledge;
- Conflicts of interest;
- Misuse of position or information; and
- Any other similar or related irregularities.

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5. REPORTING PROCEDURE

- 5.1 The Whistle-blower should immediately come forward with any information that he/she, in good faith and reasonably believes that an improper conduct was committed, is being committed or will be committed.
- 5.2 There are several channels which all parties may report their concerns under the Policy:

Internal Channel

5.2.1 Any disclosure of whistleblowing to be channelled directly to the Regional Head of Internal Audit.

5.2.2 A dedicated email (whistleblow@cgs-cimb.com) has been established for any whistle-blower to direct their disclosure directly to the Regional Head of Internal Audit. The Regional Head of Human Resource will be the alternate person who will have access to the email.

5.2.3 The disclosure of whistleblowing may be made in any form of communication – email, letter, phone call, etc.

5.2.4 To facilitate an investigation into the alleged wrongdoing, where possible and applicable, the following information should be included when making a disclosure:

- a) Brief description of the misconduct;
- b) The date and location of the incidence;
- c) The identity of the wrongdoer;
- d) Particulars of witnesses, if any;
- e) Supporting evidence and/or documents;
- f) Other details deemed to be useful to facilitate investigation and action to be carried out.

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5.2.5 Where possible, the Whistle-blower is encouraged to disclose his/her personal details to enable the relevant parties conducting the investigation to contact the Whistle-blower for further information:

- a) Name; and
- b) Contact details – email address and/or telephone number.

5.2.6 Regional Internal Audit Department (or Internal Audit Department of respective country) to provide the support in terms of investigation of any alleged wrongdoing and Group HR (or HR Department of respective country) to handle the disciplinary process.

5.2.7 In the event it is associated with the Internal Audit Department or Human Resource Department, Management will delegate the investigation to another party deemed appropriate to handle the matter for purpose of impartiality.

External Channel

5.2.8 Alternatively, the Whistle-blower may report directly to the relevant local government or regulatory authorities and enforcement agencies.

5.2.9 Whilst the Whistle-blower is able to report issues externally to the relevant government or regulatory authorities and enforcement agencies, it is urged that the Whistle-blower report any instances of improper conduct to CGS-CIMB first to enable CGS-CIMB to remedy any wrongdoings and where applicable, institute appropriate controls to prevent any further damage or loss to CGS-CIMB.

5.2.10 The Whistle-blower should also note that any investigations and/or actions taken pursuant to the submission of an external report to the relevant government or regulatory authorities and enforcement agencies would be executed in accordance with the relevant legislation empowering the relevant government or regulatory authorities and enforcement agencies and are independent of the procedures described in this Policy.

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5.3 Internal Investigation

5.3.1 Subject to Paragraph 5.2.7 above, after having examined the information disclosed, the Regional Head of Internal Audit will consult with the Regional Head of Human Resource and decide whether it warrants an investigation or may decide that other actions to be undertaken.

5.3.2 Anonymous complaints must also be looked into to ascertain whether or not a more detailed investigation is required.

5.3.3 To allow investigations to proceed in an orderly manner, the Whistle-blower must observe the following:

- a) Not to contact the suspected individuals in an effort to determine the facts or demand restitution.
- b) Not to discuss or divulge the case facts, suspicions, or allegations with/to any other person (both internally and externally); and
- c) To provide cooperation with investigating officers when called upon.

5.3.4 Depending on the outcome of the investigations, the Regional Head of Internal Audit shall recommend the appropriate action(s) to the Management.

5.3.5 If the outcome of the investigations confirms the allegations, disciplinary actions shall be instituted in accordance with the prevailing policy.

5.3.6 Decisions to report to the appropriate law enforcement and/or regulatory agencies for other actions shall be made accordingly and where necessary in consultation with the necessary parties, e.g. Group HR, Group Legal and Group Compliance.

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5.4 Protection

- 5.4.1 The Group is committed to ensure that all disclosed information, including the identity of the Whistle-blower shall be treated with strict confidentiality.
- 5.4.2 However, there may be certain circumstances where the identity of the Whistle-blower may need to be revealed (e.g. requirement to testify in court). If such a situation arises, the Group shall discuss and seek consent from the Whistle-blower first before proceeding with the involvement of the Whistle-blower.
- 5.4.3 The Group is also committed to protect the Whistle-blower from all acts of harassment, retaliation, victimisation and recrimination from subordinates, peers and superior officers arising from making the disclosure.

5.5 Responsibility of the Whistle-blower:

- 5.5.1 Whistle-blower makes the disclosure in good faith.
- 5.5.2 Whistle-blower reasonably believes that the information and allegation are substantially true.
- 5.5.3 Whistle-blower is not acting for personal gain. If the case involves the complainant's personal interests, it must be informed at the outset.
- 5.5.4 The Group also views seriously any false, malicious or defamatory allegations. This may be considered as gross misconduct and disciplinary action may be taken for such false information.

5.6 Feedback on status

- 5.6.1 The Whistle-blower will be updated on status of their report and assurance on follow-up action, provided the details of the Whistle-blower are known.