

## **OCBC WHISTLEBLOWING PROGRAMME**

### **Policy Statement**

OCBC Bank (Malaysia) Berhad and its subsidiaries (hereinafter referred to as “OCBC”) are committed to the highest level of integrity from its employees in all their dealings. Any illegal, improper, unethical conduct or questionable practices (collectively referred as “improper conduct”) by OCBC’s employees will be treated seriously and dealt with swiftly in a fair but firm manner.

### **Objective of the Programme**

This policy provides an avenue for all employees of OCBC and OCBC’s suppliers, consultants, contractors, customers and members of the public to disclose any improper conduct of OCBC employees in accordance with the procedures as provided for under this programme and to give assurance that such information from the whistleblower will be treated in strict confidence without risk of reprisals on the whistleblower.

### **Scope of Programme**

OCBC Whistleblowing Programme deals with specific concerns which include:

- *a suspected criminal offence*
- *non-compliance with regulatory requirements*
- *financial or professional misconduct*
- *a risk to the health or safety of any individual*
- *unfair treatment*
- *improper conduct or unethical behaviour*
- *attempt to suppress or conceal any information relating to any of the above.*

### **Procedure in Making a Disclosure**

Anyone can report improper conduct concerning OCBC’s employees via the following reporting channels by completing the whistleblowing form:

<p>In person (Only applicable to OCBC employees)</p>	<p>The whistleblower lodges the report in person to the following parties and is required to complete the whistleblowing form:</p> <ul style="list-style-type: none"> <li>▪ Direct supervisor</li> <li>▪ Division/ Department Head</li> <li>▪ Head of Audit</li> <li>▪ CEO</li> <li>▪ Chairman of Board of Directors</li> </ul>
<p>Email</p>	<p>The whistleblower submits the whistleblowing form via email to <a href="mailto:whistleblower@ocbc.com">whistleblower@ocbc.com</a>.</p>
<p>Mail</p>	<p>The whistleblower submits the whistleblowing form via mail in a sealed envelope marked "Private and Confidential" addressed to the Head of Audit at P.O. Box 10197, 50911 Kuala Lumpur, Malaysia.</p>

All whistleblowing reports will be assessed, regardless of whether the whistleblower's identity is disclosed or anonymous.

Alternatively, the whistleblower can report to regulators or law enforcement agencies directly (e.g. Bank Negara Malaysia, Malaysian Anti-Corruption Commission, the Police, Labour Department etc) under the Whistleblower Protection Act 2010.

### **Protection to the Whistleblower**

Protection of confidentiality of the identity of the whistleblower, to the extent practicable, will be accorded to employees and members of the public provided that the disclosure is made in good faith and without malicious intent or for personal gain. However, in the event it is discovered that the whistleblower has made a disclosure in bad faith and/or with malicious intent and/or for ulterior/improper motive or for any personal gain, the protection can be revoked. Employees who whistleblow are given the additional protection that he or she will not be subject to detrimental or retaliatory actions at the workplace.

The principles on confidentiality granted to the whistleblower will also apply equally to the employee under investigation.

OCBC has an independent investigation process to investigate all whistleblowing reports based on investigation protocol which accords with the principles of fairness, independence and propriety.

Where the improper conduct involves a suspected criminal offence, OCBC will report the matter to the relevant authority for their further action and unless compelled by law, will strictly safeguard the identity of the whistleblower.

**Notification to Whistleblower**

The whistleblower will be accorded the privilege to be notified by OCBC on the outcome of his or her report of improper conduct to the extent legally permissible having regard to the rules on banking secrecy and privacy of personal data or other legal constraints.

*OCBC Bank reserves the right to amend this programme from time to time. The programme is available at <https://www.ocbc.com.my/personal-banking/help-and-support/help-and-support.html>.*

## WHISTLEBLOWING FORM

This form should be completed by employees and members of the public to report any suspected and/or known improper conduct (misconduct or criminal offence) concerning OCBC.

If you are an employee of OCBC who is reporting the suspected and/or known improper conduct, you are encouraged to state your name, employee number, designation, department, company, current address, contact number and e-mail address.

If you are not an employee of OCBC, you are encouraged to state your name, name of employer, designation, current address, contact number and e-mail address.

When describing the suspected and/or known improper conduct, please provide as much of the following information: Use additional pages if necessary.

- Who?** Who is involved? If it involves third parties, what are the names of the businesses, who owns them, and where are they located? Who else knows about the improper activities? Who are the witnesses who can shed more light into the suspected and/or known improper conduct or are able to confirm that they occurred? How can these witnesses be contacted?
- What?** What specifically did the suspect do? What is wrong with it? Are there laws or regulations that govern what the suspect did? What documents are you able to provide as evidence of the improper conduct?
- Where?** Where did the improper conduct take place? Which department, division etc.?
- When?** When did the improper conduct happen? Is it ongoing? How frequently has it occurred?
- Why?** What was the suspect's motive? What did the suspect benefit from the improper conduct?
- How?** How did the improper conduct happen? Was there a lack of controls, circumvention of controls, or collusion with other individuals?

If you have additional questions or require clarification, please contact [whistleblower@ocbc.com](mailto:whistleblower@ocbc.com)

**WHISTLEBLOWING FORM**

(\*) Denotes mandatory field

<b>A. PERSONAL PARTICULARS OF WHISTLEBLOWER</b> <i>Section to be left blank if whistleblower chooses to remain anonymous.</i>				
Name				
Employee No. <i>(for employees only)</i>				
Designation				
Department				
Name of Employer				
E-mail Address				
Telephone No.				
Correspondence Address				
Preferred method of communication* <i>(Please tick the appropriate box)</i>	E-mail	Telephone	Letter	Interview
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>B. INFORMATION OF THE SUSPECT(S) INVOLVED IN THE IMPROPER CONDUCT</b> <i>Please use additional sheet(s) if there are more than two suspects</i>				
<b>Who is (are) the suspect(s)?*</b>				
<b>Name of Suspect 1</b> <i>Who is involved?</i>				
Designation				
Department				
Company				
Relationship between Whistleblower and Suspect 1				
<b>Name of Suspect 2</b> <i>Who is involved?</i>				
Designation				
Department				
Company				
Relationship between Whistleblower and Suspect 2				

**C. DETAILS OF WITNESS(ES) WHO ARE ABLE TO CONFIRM THE IMPROPER CONDUCT (IF ANY)**

*Please use additional sheet(s) if there are more than two witnesses*

<b>Who is (are) the witness(es)?</b>	
<b>Name of Witness 1</b>	
Designation	
Department	
Company	
Telephone No.	
E-mail Address	
<b>Name of Witness 2</b>	
<i>Who is the witness?</i>	
Designation	
Department	
Company	
Telephone No.	
E-mail Address	

**D. DETAILS OF THE IMPROPER CONDUCT**

*Briefly describe the improper conduct and how you know about it. Specify who, what, where, when, why and how. If there is more than one allegation, number each allegation and use as many sheets as necessary.*

<b>What did the Suspect(s) do?*</b> i. Nature of the Improper Conduct ii. Frequency of the Improper Conduct iii. Items or Material Involved ( <i>i.e. Cash, Watch, etc.</i> ) iv. Estimated or exact Amount Involved	
<b>Where did it occur?*</b>  <b>(Place)</b>	
<b>When did it occur?*</b>  <b>(Date and Time)</b>	

<b>Why did it occur*?</b>		
<b>How did it occur*?</b>		
<b>Is there any documentary evidence?</b> <i>Please describe the documentary evidence and attach a copy of evidence that you have already in your possession to this form. If you do not have them, please indicate where the documents can be found.</i>		
<b>E. PREVIOUS REPORT TO LOCAL OR INTERNATIONAL AUTHORITIES, IF ANY</b>		
Have you lodged a report of the Improper Conduct through any local or International Authorities? <i>(Tick the appropriate box)</i>	Yes	No
Report/ File Reference No.		
Name of Party of Authority Receiving the Report		
Position and Department		
Date of Report		
Status of Report <i>Please attach a copy of the report made to the internal or external party or authorities.</i>		
<b>F. ADDITIONAL COMMENTS</b> <i>Please use additional sheet(s) if necessary</i>		
Do you have any other details or information regarding the improper conduct which would assist us in the investigation?		
<b>G. DECLARATION OF GOOD FAITH*</b>		
I hereby declare that all information given herein is made in good faith and voluntarily to the best of my knowledge and I will ensure that my participation in this matter will be kept confidential. I do		

understand that OCBC will use the information, document and material provided throughout the investigation process.

I further agree that the information provided herein may be forwarded to a department/authority/enforcement agency for purposes of investigation.

I fully understand that by signing this Form, I will be entitled to whistleblower protection from OCBC as set out in OCBC Whistleblowing Policy. I also fully understand that in the event I have made this report maliciously or in bad faith, the whistleblower protection stated in OCBC Whistleblowing Programme will not be applicable to me and I may be subject to disciplinary or legal proceedings by OCBC.

\_\_\_\_\_  
(Signature)

Name:

Date:

**H. FOR OFFICE USE ONLY**

Name of Designated Officer who received the Whistleblower report	
Date when Whistleblower report received by Designated Officer	
Case Reference No.	
Remarks/ Conclusion	