



WHISTLEBLOWING POLICY OF ETIQA LIFE AND GENERAL ASSURANCE PHILIPPINES, INC.

Version: 1.0

Policy Owner: Compliance Department

Last Annual Review: N/A

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Table of Contents

1.0	POLICY STATEMENT.....	1
2.0	OBJECTIVES OF THIS POLICY.....	1
3.0	SCOPE	1
4.0	DISCLOSURE CHANNELS	1
5.0	CONFIDENTIALITY AND PROTECTION OF WHISTLEBLOWER	2
6.0	WHISTLEBLOWING GOVERNANCE COMMITTEE	2



1.0 POLICY STATEMENT

ETIQA Life and General Assurance Philippines, Inc., “ELPGAP” (formerly known as AsianLife & General Assurance Corporation) is committed to the highest standard of ethics and integrity in its conduct of business and operations. As part of this commitment, ELGAP has in place an avenue for disclosure of any improper conduct.

2.0 OBJECTIVES OF THIS POLICY

The objective of this policy is to ensure that all employees and members of the public have access to secured channels to make disclosures on any improper conduct by any member or representative of ELGAP, with the assurance that there will be no repercussion against them.

3.0 SCOPE

Improper conduct includes, but is not limited to:

- Bribery and corruption;
- Fraud, theft or embezzlement;
- Abuse of power by an employee;
- Conflict of interest;
- Breach of the Market Conduct Guidelines;
- Breach of ELGAP’s Code of Conduct;
- Failure to comply with legal and regulatory obligations (Data Privacy Act, Anti-Money Laundering Act and Counter Terrorism Financing);
- Unauthorized disclosure of customer information; and
- Concealment of any of the above.

Any person who is aware of, or has reasonable grounds to suspect that, any improper conduct has been committed by an employee or representative of ELGAP can make a disclosure.

4.0 DISCLOSURE CHANNELS

Disclosures can be made via any of the following channels:

Hotline	24 hours toll free number _____ for overseas with _____ secured voice recording
E-mail	whistleblowing@etiqa.com
Letter	

Whistleblowers are encouraged to include the following information in the disclosure to facilitate investigations:

- Name of person(s) involved;
- Date and time of the event;
- Nature of the event;
- Witness to the event, if any; and
- Evidence of the event, if any.

5.0 CONFIDENTIALITY AND PROTECTION OF WHISTLEBLOWER

The identity of a whistleblower who made a disclosure in good faith will be kept confidential and will only be disclosed on a strictly need-to-know basis. Employees who whistle blow in good faith will also be protected by ELGAP from any repercussion.

6.0 WHISTLEBLOWING GOVERNANCE COMMITTEE

ELGAP's Whistleblowing Governance Committee is chaired by the President/ CEO with the following members:

Human Capital Officer
Risk Officer and;
Compliance Officer

The governance committee provides oversight to ensure that disclosures made via the whistleblowing channels are accorded with adequate attention, independence, investigation and remedial action, where necessary.



WHISTLEBLOWING PROCEDURES OF ETIQA LIFE AND GENERAL ASSURANCE PHILIPPINES, INC.

Version: 1.0

Procedures Owner: Compliance Department

Last Annual Review: N/A

Last Updated: N/A

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1. Overview	3
2. Owner of the Procedures.....	3
3. Governance Structure	3
4. Roles and Responsibilities.....	5
5. Handling of Whistleblowing Concerns	6
6. Investigation of Whistleblowing Concerns	7
7. Confidentiality of Identity of the Whistleblower	6
8. Record Keeping	8
9. Reporting	8
10. Whistleblowing Procedure Flowchart (Annex A)	9

1. Overview

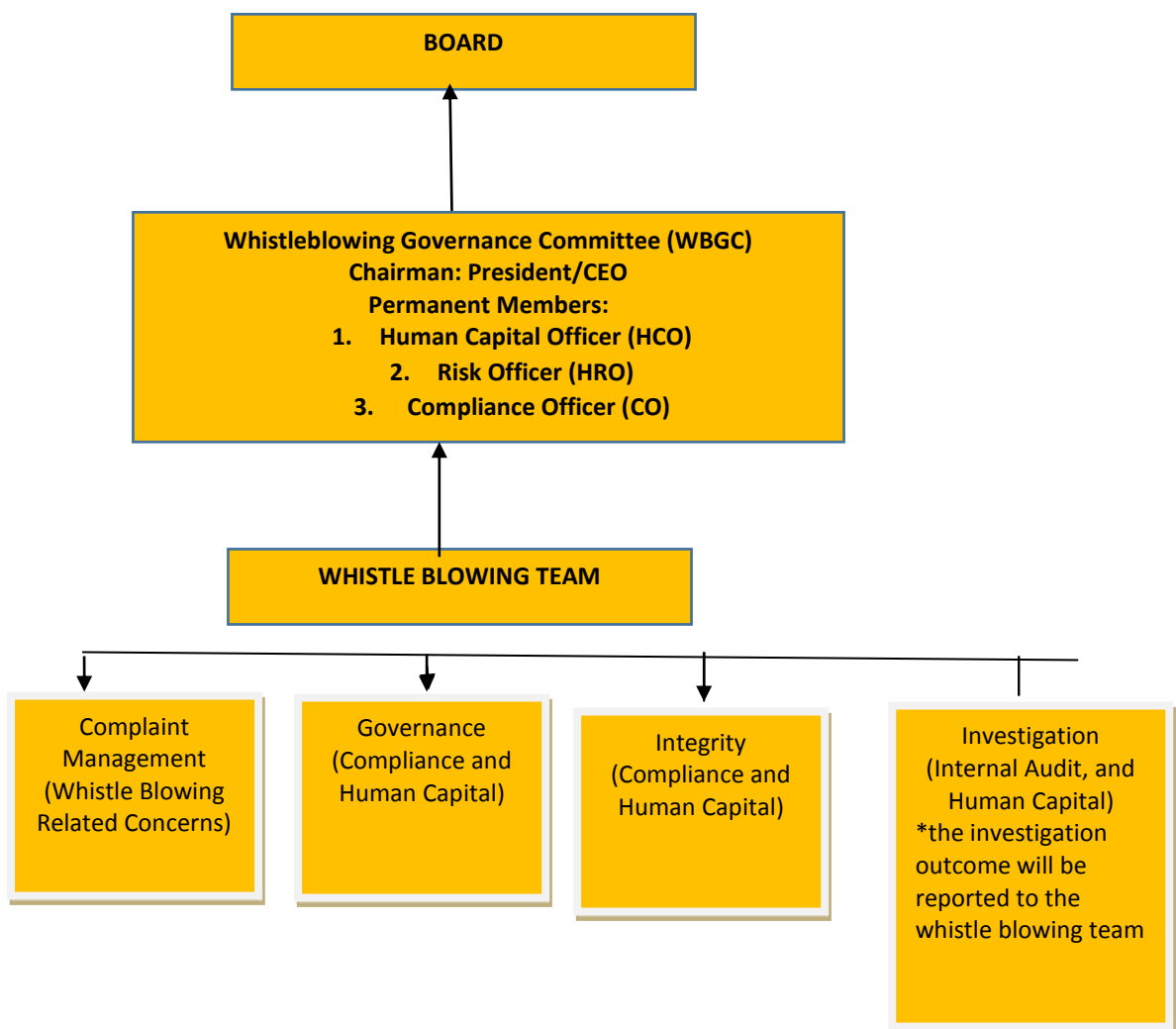
The ELGAP Whistleblowing Procedures (“Procedures”) supports the Maybank Group Whistleblowing Policy (“Policy”) in setting out the detailed steps in the handling of the whistleblowing concerns. This Procedures is not intended to be a substitute for personal discretion and readers are expected to exercise sound judgment to meet the objectives of this Procedures.

2. Owner of the Procedures

This Procedures is owned by **Compliance Department (“CD”)** and must be reviewed on annual basis, or as and when there are changes to the Policy. Revision to this Procedures must be approved by the **Whistle Blowing Governance Committee (“WBGC”)**.

3. Governance Structure

The oversight and governance structure of the ELGAP’s Whistleblowing Process is as per the diagram below:



4. Roles and Responsibilities

- **Whistleblowing Governance Committee (“WBGC”)**

- Review and assess the adequacy of the policies and procedures in line with the requirements for ELGAP;
- Evaluate, deliberate and decide (approve or reject) the closure and/or closure steps of investigation on whistleblowing cases and to make recommendations, where required; and
- Review and deliberate on management indicators such as the statistic on cases received from the whistleblowing channels, nature of the cases received, trend analysis, cases proposed for closure and cases under on-going investigation.
- ELGAP’s Whistleblowing Governance Committee is chaired by the President/ CEO with the following members:

Human Capital Officer
Risk Officer and;
Compliance Officer

- **Compliance Officer (“CO”)**

- Provide oversight and ensure an effective ELGAP’s Whistleblowing Framework; and
- Review and escalate whistleblowing concerns raised against the Management Committee Members to the Chairman of the WBGC or the Board, whichever is appropriate.

- **Whistleblowing Team (WT)**

- Evaluate and filter all whistleblowing concerns received, to exclude non-improper conduct issues (e.g. customer service complaints). Based on the nature of the concern, the team will escalate the whistleblowing concern to the designated investigation party (refer to Section 6);
- Monitor and follow-up on the outcome of all cases escalated to other parties for investigation; and
- Consolidate, evaluate and report all cases received, status of investigation and outcome of investigation to the WBGC; and
- Table the statistics, status of investigation of whistleblowing cases and outcome of the investigations to the WBGC.

- **Internal Audit (“IA”) and Human Capital (“HC”)**

- Validate the claims by the whistleblower to ascertain whether the claim is substantiated and a prima facie can be established;
- Complete the investigation process in accordance to the agreed turnaround time/service level agreement;

- Exercise due care to protect the confidentiality of the whistleblower and disclose information only on need-to-know basis; and

Provide ongoing updates to the Whistleblowing team for reporting to the WBGC.

5. Handling of Whistleblowing Concerns

The concerns from the secured channels (i.e. email, letters and hotline) will be retrieved by the Whistleblowing team and the designated representatives from Human Capital. This is to ensure that there is a check-and-balance process and all concerns are to be handled professionally. All concerns received shall be treated with the strictest confidentiality, captured and tracked in a centralized database maintained by the Whistleblowing team in the Compliance Department.

- **E-mail** - Copies of all emails received will be channeled to 2 mailboxes, each maintained independently by Whistleblowing team and Human Capital. The emails from the 1st mailbox will be reviewed by the Whistleblowing team on daily basis, and all emails and concerns noted will be updated in a tracker. A representative from Human Capital will verify the tracker against the emails in the 2nd mailbox to ensure that all concerns are correctly captured.
- **Hotline** - All calls received via the hotline will be stored in a call-logger application. No one has access to delete the calls including the administrator and vendor of the application. An officer from Whistleblowing team will listen to the calls on a weekly basis, and all calls and concerns will be updated in a tracker. A representative from Human Capital will verify the tracker by listening to the calls independently to ensure that all concerns are correctly captured.
- **P.O. Box** - The key to the letter box will be stored in a safe deposit box which requires 2 officers (1 officer from Whistleblowing team and another officer from Human Capital) to unlock. Both officers will also be retrieving the letters together from the letter box on a weekly basis. All letters received will be opened in the presence of both officers.

The Whistleblowing team will review and perform a preliminary evaluation to ascertain if the concern meets the scope of Reportable Improper Conduct as stated in the ELGAP Whistleblowing Policy. Thereafter, the complaint/concern will be escalated to the designated investigation party (refer to Section 6) **within 2 working days**.

Where there is insufficient information to proceed with an investigation, the Whistleblowing team will follow-up with the whistleblower, via any possible mean, to request for further information. If there is no response from the whistleblower within **14 days** of the follow-up, the Whistleblowing team will table the concern to the WBGC and propose the next course of action.

6. Investigation of Whistleblowing Concerns

Upon evaluation by the Whistleblowing team, all concerns that meet the scope of Reportable Improper Conduct as stated in the ELGAP's Whistleblowing Policy will be escalated to the designated investigation party. Generally, for concerns related to people issue such as harassment, unfair treatment from line manager/reporting manager etc. will be escalated to Human Capital for investigations while other concerns will be escalated to Internal Audit to investigate.

- Human Capital
 - Significant breach of ELGAP's Code of Ethics and Conduct; or
 - Bullying and harassment of Employee (i.e. unfair treatment from line manager/reporting manager etc.)
- Internal Audit
 - Fraud, bribery and corruption;
 - Unauthorized disclosure of customer information;
 - Breach of ELGAP's internal policies and procedures
 - All other concerns which are related to customer complaint in nature, such as complaints about ELGAP's products and services.

The outcome of all investigations by IA and HC will be updated to the WBGC.

Employees (including investigators and members of the Whistleblowing team) who have conflict of interest shall declare and **exclude themselves** from the investigation and with no access to files or records or be made privy to any information related to the investigation.

All investigations must be completed by HC or IA **within 28 calendar days**. Should there be a need for an investigation to be conducted for more than 28 calendar days, the investigation party should provide justifications for the extension. Whistleblowing team should highlight the case to WBGC for their awareness and concurrence.

7. Confidentiality of Identity of the Whistleblower

All parties involved in the management, investigation and decision making of a whistleblowing cases must act in the following manner:

- Maintain complete confidentiality/secretcy of the identity of the whistle blower and the concern raised at all times;
- When further information/data is required from other stakeholder to facilitate the investigation, the investigator must be discreet and only disclose minimal information on the concern on need-to-know basis only to the stakeholder;

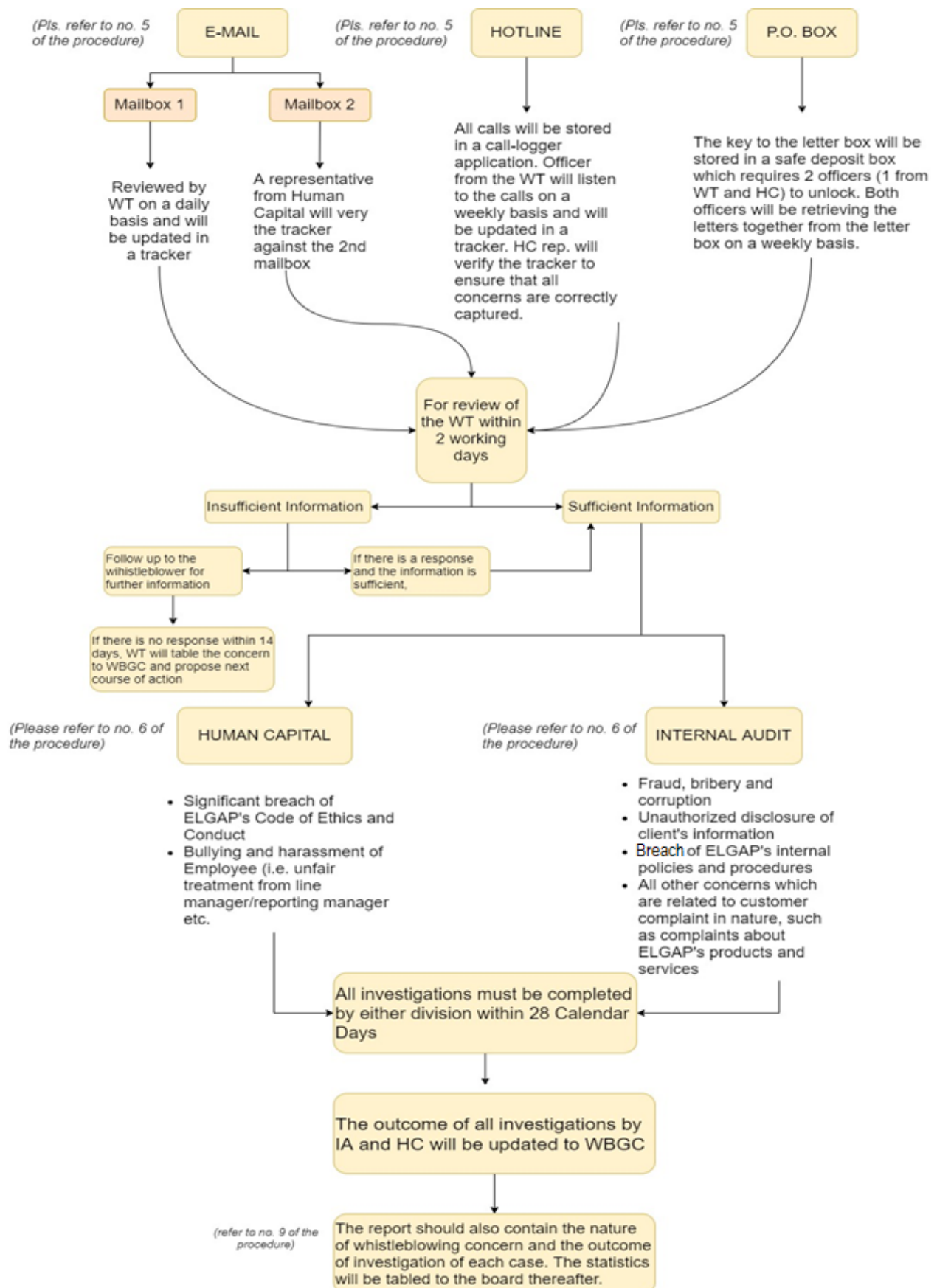
- Discussion is to be made with authorized personnel only or with the persons required for the purpose of completing the investigations and inquiries. Non-compliance to this constitutes misconduct and will be subject to disciplinary action as spelt out in the ELGAP's Code of Conduct and other Internal Policies;
- Maintain records/reports in a secured environment and under lock-and-key when away from work station;

8. Record Keeping

All whistleblowing related records shall be classified as **"Highly Confidential"** and managed accordingly. The retention period for the said document shall be in accordance to regulatory requirement on record-retention such as stated in the Data Privacy Act of the 2012.

9. Reporting

Once every two months, the Whistleblowing team will table the ELGAP's whistleblowing statistics, comprising of completed cases and ongoing cases, to the WBGC. The report should also contain the nature of whistleblowing concern and the outcome of investigation of each case. The statistics will be tabled to the Board thereafter.



Annex A- Whistleblowing Procedure Flowchart