



Chubb Insurance Malaysia Berhad (Company No: 197001000564)

Policy & Procedures

Whistleblowing Policy

Policy Reference Matrix

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| Related BNM Policy / Guidelines / Acts | 1. BNM/RH/PD 029 Corporate Governance 2. Financial Services Act, 2013 3. Whistleblowing Protection Act, 2010 | | | | | | | | | | | | | |
| Related Internal Policy / Guidelines | 1. Code of Conduct 2. Chubb Group Investigations Policy 3. Fit & Proper Policy 4. Other applicable guidelines or procedures issued by Regional / Global Compliance from time to time. | | | | | | | | | | | | | |
| Upload to the Village | <input type="checkbox"/> Confidential, not to be published on the Village <input checked="" type="checkbox"/> Publish on the Village | | | | | | | | | | | | | |
| Where to seek help? | Please contact: <table border="1" data-bbox="430 1411 1307 1653"> <thead> <tr> <th>No</th><th>Name</th><th>Email</th></tr> </thead> <tbody> <tr> <td>1</td><td>Fiona Yew</td><td>Fiona.Yew@Chubb.com</td></tr> <tr> <td>2</td><td>Joy Tey</td><td>Joy.Tey@Chubb.com</td></tr> </tbody> </table> | | | | | No | Name | Email | 1 | Fiona Yew | Fiona.Yew@Chubb.com | 2 | Joy Tey | Joy.Tey@Chubb.com |
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Document Version Control

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| 4.0 | 1 December 2025 | Joy Tey Denise Teoh | Joy Tey | <ul style="list-style-type: none"> Inserted Policy Reference Matrix to provide clarity in related regulatory and internal policies and guidelines, and the timeline for next review. A Document Version Control section has been added to provide clarity regarding the changes made. Clarified applicability of the Policy to parties and added applicable legislations, guidelines, and regulations which the Policy shall be read with, under Section 1. Added new definitions under Section 2. Clarified and expanded Section 3 regarding the treatment of HR-related matters. Added a new a designated whistleblowing email at SpeakUp.MY@chubb.com under the External Whistleblower Channels, which replaces the ChubbCompliance.MY@Chubb.com email, under Section 4. The escalation process has been separated into a new Section 7 (was previously included under the Investigation Process section). Added the Chief Risk Officer's reporting obligations to Bank Negara Malaysia under Section 8. Added new reporting obligations to the Board of Directors on the Whistleblowing Register and Summary Report, on a half-yearly basis – under Section 10. Added a new section on conducting periodic whistleblowing simulation under Section 11. Added standard statement for acknowledgement of receipt in Appendix B. |

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Scope and Purpose

- 1.1 At Chubb Insurance Malaysia Berhad (“**Company**”), we take pride in our reputation and our commitment in always putting integrity first. All employees and directors of the Company play a part in maintaining this reputation and continuing to uphold the Company’s success.
- 1.2 Reporting concerns can help the Company improve processes and solve problems quickly. The purpose of this Whistleblowing Policy (“**Policy**”) therefore is to encourage the reporting of any behaviour that may be illegal, unethical, corrupt, or otherwise cause damage to the Company’s reputation.
- 1.3 As such the Company is committed to establishing accessible, confidential, and trusted reporting channels which may be used anonymously by internal and external parties to raise concerns in relation to known or suspected improper conduct.
- 1.4 In addition to the above, Dr. Michael Heng Kiah Ngan, a non-executive director of the Company, has been designated to be responsible for the effective implementation of this Policy (“**Designated Responsible Director**”). This includes evaluating periodic reports that monitor and assess how concerns are escalated and dealt with and overseeing periodic reviews of the effectiveness of this Policy.
- 1.5 The Policy is applicable to employees, directors of the Company and should be read in conjunction with the Whistleblower Protection Act, 2010, Malaysian Anti-Corruption Commission (“**MACC**”) Act, 2009 – Section 17A on Corporate Liability and all internal policies and guidelines, but not limited to Chubb’s Code of Conduct. Where regulatory requirements differ from this policy, the more stringent requirements will apply.
- 1.6 This Policy also provides channels for the Company’s stakeholders or external parties (such as customers, vendors/suppliers, consultants) to report any misconduct, impropriety, or breach of regulations / laws.

Definitions

- 2.1 **Whistleblowing** refers to the voluntary disclosure of information pertaining to an activity of wrongdoing or an improper conduct committed by a person within the Company.
- 2.2 **Whistleblower** refers to the person who makes a disclosure of an activity of wrongdoing or improper conduct within the Company.

- 2.3 The **Ombudspersons** are tasked with ensuring the protection of Whistleblowers and taking appropriate corrective actions. They comprise the Chairman of the Board Risk Committee, who serves as the **Designated Board Ombudsperson**, together with the **Management Ombudspersons**, namely the Country President, Chief Compliance Officer, Chief Legal Officer and Head of Human Resources.

What is Improper Conduct?

- 3.1 Conduct by the Company or any of its directors, employees, and third parties will be considered to be improper when it does not meet the Company's regulatory obligations or where it may otherwise be considered illegal, fraudulent, unethical, corrupt, or inconsistent with the Company's internal policies.
- 3.2 Examples of improper conduct include but are not limited to:
- (a) Bribery and Corrupt conduct;
 - (b) Fraudulent activity (including fraud, theft, embezzlement or dishonest conduct);
 - (c) Conduct that breaches any specified obligations under the Financial Services Act 2013 ("**FSA**") or any other applicable laws or rules or regulations applicable to the Company;
 - (d) Any form of harassment including workplace and sexual harassment;
 - (e) Actions which can cause physical danger/harm to another person and/or can give rise to risk of damage to properties/assets;
 - (f) Substantial mismanagement of the Company's resources or duties;
 - (g) Conduct which may cause financial loss to the Company or bring it to severe public disrepute or ridicule or is otherwise detrimental to the Company's interests;
 - (h) Conduct that breaches any obligations under the Chubb Code of Conduct or the Company's Policies and Procedures;
 - (i) Poor or unethical sales practices, including mis-selling;
 - (j) Conflict of interest; or
 - (k) Misuse of position or information which may result in profiteering.
- 3.3 Excluded from the scope of this Whistleblowing Policy are HR-related matters such as personal grievances, interpersonal conflict, leave or pay disputes, or complaints against another staff or employer that do not involve improper conduct, or do not give rise to operational risks/losses to the Company. Such matters should be reported to the Human Resources ("**HR**") department for their investigation and further action. The HR department is to then provide an update to the Management Ombudspersons who will determine if there is an improper conduct or not. If there is, it will be classified as whistleblowing and will be subjected to the Whistleblowing Policy.

Reporting Improper Conduct

- 4.1 All directors, Company employees and third parties (such as contractors, consultants, agents and interns) have a responsibility to report any known or suspected incidences of improper conduct. If such individual chooses to make a report of improper conduct to the Company via any one of the whistleblowing channels provided herein, such individual shall be referred to as “Whistleblower” in this Policy provided that:
- (a) He/she is acting in the Company’s/department’s interest and not on mere personal grievances and complaints; and
 - (b) He/she believes that an improper conduct is about to take place or had taken place.
- 4.2 The above responsibilities to report include situations where employees come across a person who is accountable or responsible for the management and oversight of the Company, comprising the senior officers, Country President, and directors of the Company (“**Key Responsible Person**”) – who does not meet the Company’s fit and proper criteria.
- 4.3 The Whistleblower must report in good faith, free from malicious intent, and not for personal gains i.e. the report must be honest and genuine and motivated by wanting to report an improper conduct. If the subsequent investigation reveals that the report was made with malicious intent, appropriate action can be taken against the Whistleblower.
- 4.4 Whistleblowing may come from within the Company (directors, employee etc.) (“**Internal Whistleblower**”) or by external parties (customer, third party provider, agents etc.) (“**External Whistleblower**”).

Internal Whistleblower Channels:

- 4.5 The Company has put in place multiple whistleblowing channels for the employees to report improper conduct. Depending on the nature of an improper conduct, a Whistleblower may report through either one of the following channels (unless the person you are making the report to is also the subject matter of the improper conduct):
- (a) to the respective Head of Departments (copying HR, the Chief Compliance Officer, or the Country President);
 - (b) to the Chief Compliance Officer;
 - (c) to the Country President;
 - (d) to the Designated Responsible Director at Michael.Heng@Chubb.com;
 - (e) to the Whistleblowing Box located at ground floor of Wisma Chubb (maintained by the Compliance department);

- (f) to the designated whistleblowing email at SpeakUp.MY@chubb.com, accessible by the Management Ombudspersons; or
- (g) via the Chubb Ethics Helpline.

(The Chubb Ethics Helpline is a free and confidential service managed by a third-party provider, accessible 24 hours a day, 7 days a week, by internet at The Village or by calling the following number (if calling from Malaysia): 1-800-81-6270)

- 4.6 The Whistleblower may also report directly to relevant government or regulatory authorities and enforcement agencies in Malaysia as prescribed by the Whistleblower Protection Act, 2010 such as Bank Negara Malaysia (BNM), Malaysian Anti-Corruption Commission (MACC), Association of Banks Malaysia (ABM), Securities Commission of Malaysia, Police, etc.
- 4.7 Except for whistleblowing reports made to the Chubb Ethic Helpline or the relevant government authorities, the Whistleblower can use the whistleblower form in **Appendix A (“Whistleblower Form”)**. The Whistleblower Form is also available on Chubb Malaysia’s corporate website.

External Whistleblower Channels:

- 4.8 For external parties, a Whistleblower can report any known or suspected incidences of improper conduct by submitting the completed Whistleblower Form (available on Chubb Malaysia’s corporate website) through the following channels:
 - (a) to the designated whistleblowing email at SpeakUp.MY@chubb.com ;
 - (b) to the Designated Responsible Director at Michael.Heng@Chubb.com; and
 - (c) to the Whistleblowing Box located at ground floor of Wisma Chubb.
- 4.9 Similarly, the Whistleblower may also report directly to relevant government or regulatory authorities and enforcement agencies in Malaysia as prescribed by the Whistleblower Protection Act, 2010.
- 4.10 All owners of the whistleblowing channels shall acknowledge receipt of the report to the Whistleblower within three (3) working days from date of receipt, using the standard wordings in **Appendix B**.

Withdrawal of Report

- 4.11 The Whistleblower who wishes to withdraw his/her report is required to withdraw the report in writing using the same channel together with supporting reason(s) for the withdrawal. Notwithstanding such withdrawal, the Company reserves the right to proceed with investigation on the matters arising from the report.

Maintaining a Whistleblowing Register

- 4.12 The Chief Compliance Officer is responsible of keeping the whistleblowing register (“**Whistleblowing Register**”) up to date and confidential. Any requests to assess the Whistleblowing Register shall be granted by the Chief Compliance Officer if the assess is necessary in order to meet regulatory requirements.
- 4.13 To maintain an up-to-date and comprehensive Whistleblowing Register, the Ombudspersons must immediately notify the Chief Compliance Officer of all Whistleblower reports or escalations received. The Chief Compliance Officer is responsible for providing the Board with status updates every half-yearly.

Protection of Whistleblower

- 5.1 The Company is committed to ensure that Whistleblower is not disadvantaged in any way for raising genuine concerns about known or suspected improper conduct.
- 5.2 A Whistleblower will be protected under this Policy, where they make a report in good faith and where it can be demonstrated that there are reasonable grounds for the belief that improper conduct has occurred (“**Protected Reporting**”).
- 5.3 Where a Whistleblower makes a Protected Reporting, all Company employees must refrain from any activity that could be perceived to be victimisation, harassment, retaliation, or unfair treatment in response to the Protected Reporting.

Confidentiality

- 6.1 The Company will take all reasonable steps to protect the identity of the Whistleblower. The Company recognises that maintaining confidentiality is crucial to ensuring reprisals are not made against the Whistleblower.
- 6.2 All employees of the Company must take all reasonable steps to maintain the confidentiality of a Whistleblower they know or suspect to have made a Protected Reporting. Any employee who knowingly discloses (whether directly or indirectly) information about the investigation to the person under investigation or any other person, shall be deemed to have breached this Policy and will be dealt with as an employee misconduct accordingly.
- 6.3 All information received in respect of a Protected Reporting will be held in the strictest confidence. Access to the folder containing whistleblowing information and documents is limited to selected personnel on a strictly need to know basis only. The Company will make efforts to protect the identity

of the Whistleblower and confidentiality of information provided. Information will only be disclosed as required under the provisions of the law.

- 6.4 While a Whistleblower can choose to remain anonymous and all reporting of improper conduct in good faith and not for malicious intent will be investigated, a Whistleblower is encouraged to identify himself/herself when reporting. This will increase credibility of the report and will allow the Company to follow up to ascertain the facts or to obtain further information for investigation purposes.

Escalation Process

- 7.1 For reports received through **all the whistleblowing channels (except for reports received through Chubb Ethics Helpline)**, the recipients responsible for the respective channels (“**Channel Owner**”) should immediately escalate the report to the Chief Compliance Officer, unless it involves the Compliance team or a Key Responsible Person as the subject matter of the report.
- 7.2 If the Compliance team or a Key Responsible Person is the subject matter of the report, the report should then be escalated by the Channel Owner or the Chief Compliance Officer to the Regional Compliance Officer of Asia Pacific (“**Regional Compliance**”) directly, without any delay.
- 7.3 For reports received through the **Chubb Ethics Helpline**, the third party who handles the helpline shall escalate the reports to the Regional Compliance for their deliberation on who should conduct the investigation.

Assessment and Investigation of Improper Conduct

- 8.1 All reports made by Whistleblower (whether by internal or external parties) will be undertaken in a manner that is confidential, fair and objective. For a report to be investigated, it must contain sufficient information to form a reasonable basis for investigation. Where possible, supporting documents are to be produced to facilitate such investigations.
- 8.2 Upon receiving reports from the respective Channel Owners, the Chief Compliance Officer will determine whether such reports are legitimate and is an improper conduct.
- (a) **If the report qualifies as improper conduct:** The Chief Compliance Officer shall inform the Designated Director of such whistleblowing report, commence the investigation process, and provide progress updates to the Director until the finalisation of the investigation report.
- (b) **If the report does not qualify as improper conduct:** The Chief Compliance Officer shall redirect the report to the correct avenue.

- 8.3 For reports escalated to the Regional Compliance, depending on the subject matter, the Regional Compliance may at its discretion appoint anyone to assist in the investigation. The Regional Compliance officer shall also inform the Designated Director of such whistleblowing report (unless it was received from such Director) and provide periodic progress updates to the Company's Board until the investigation report is finalised.
- 8.4 In relation to the investigation, the investigating party shall be determined in accordance with the Chubb Group Investigations Policy. For example, for matters involving operational lapses, Internal Audit may be appointed to carry out the necessary investigation whereas for allegations of misconduct, breach of Code of Conduct and all other allegations under the "Covered Investigation" defined in the Investigations Policy, the Legal or Compliance teams may be appointed instead.
- 8.5 During the investigation, the investigator may reach out to the Whistleblower for additional information and/or documents to assist in the investigation. If the Whistleblower is unable to substantiate its allegations with reliable evidence, the Company cannot be responsible to act on it.
- 8.6 All investigations shall be completed by the Company as soon as possible. For whistleblowing reports managed by the Management Ombudspersons, once the investigation has been completed, the findings together with the action items will be shared with the Country President, Designated Director, and Chief Compliance Officer (where applicable). The Chief Compliance Officer shall then table the investigation outcome to the Board.
- 8.7 Appropriate corrective or disciplinary actions, up to and including termination, will be taken where a finding of improper conduct is made.
- (a) If it involves an **employee**, it shall be dealt with in accordance with the guidelines set out in the Company's Human Resources Policies & Procedures Manual. The finding shall be captured in the personal file of the employee and will be made available for the purpose of background screening by the future employee in accordance the BNM's Policy Document on Employee Screening.
- (b) If it involves an **agent**, it shall be dealt with in accordance with the Company's Guidelines on Action Against Agents for Complaints and Breach of Conduct, and/or in accordance with BNM's Policy Document on Professionalism of Insurance and Takaful Agents. In addition to the above, the Company shall inform PIAM of the improper conduct of the agent within ten (10) working day upon determining the appropriate action against the agent.
- 8.8 Any incidents that are reportable to Bank Negara Malaysia arising from any final investigation reports, shall be submitted by the Chief Risk Officer under the relevant regulations.

8.9 A summary of the entire process flow is in **Appendix C**.

Breach of this Policy

9.1 Where an employee of the Company breaches this Policy, the breach will be considered a breach of the Chubb Code of Conduct and will be dealt with accordingly.

Reporting Obligations

10.1 The Chief Compliance Officer shall table and present the Whistleblowing Register and Whistleblowing Summary Report to the Board of Directors on a half-yearly basis, or more frequently as deemed necessary.

10.2 The report shall include, at minimum:

- (a) the total number of whistleblowing reports received during the reporting period;
- (b) the number and nature of reports assessed as legitimate or non-legitimate whistleblowing cases;
- (c) the status and outcome of investigations completed or in progress; and
- (d) any key trends or recurring issues observed.

Periodic Whistleblowing Simulation

11.1 The Compliance department will conduct periodic whistleblowing simulation exercises involving the Company's employees and/or business associates ("**Simulation Exercise**") – which will evaluate the effectiveness of:-

- (a) whistleblowing channels for reporting;
- (b) response time;
- (c) adequacy of responses;
- (d) effectiveness of information gathering;
- (e) validation; and
- (f) review and escalation process, prior to resolution protocols.

11.2 Following the Simulation Exercise, Compliance will identify and document any gaps or observations, determine their root causes, and communicate the proposed appropriate corrective actions to the responsible owners for their implementation and timely completion.

11.3 The findings and outcomes from the Simulation Exercise, together with the status of corrective actions, will be compiled into a report by Compliance and submitted to the BAC and Board of Directors. This report will be used to evaluate, enhance, and strengthen overall protocols, ensuring the continued effectiveness of the whistleblowing process under this Policy.

Review of this Policy

- 12.1 This Policy will be reviewed periodically as required to ensure that it complies with all relevant laws and remains relevant and effective.

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Whistleblowing Form

Important Notice

While all reporting of improper conduct in good faith and not for malicious intent will be investigated, a Whistleblower is encouraged to identify himself/herself when reporting, for credibility purposes and to allow an avenue for the Company to follow up to ascertain the facts or to obtain further information for investigation purposes. Please attach reliable evidence to substantiate your disclosure and assist in the investigation. You may use additional sheets for additional witnesses or supporting evidence if necessary.

Section A: Disclosure Details

| Questions | Answer/Explanation |
|--|--------------------|
| Name of person(s) involved in the incident or issue. | |
| Department/Designation: | |
| If money is involved, please indicate the amount involved? | |
| Do you suspect any other people that are involved? Please provide the details, if any. | |
| Do you suspect that the management is involved? Please provide the details, if any. | |
| Have you notified anyone? Please provide the details, if any. | |
| Any witness? Please provide the name, department and other relevant details. | |
| Date, Time and Location of the incident or issue? | |
| How did you discover the incident or issue? | |
| Please provide a description of the incident or issue. | |

Section B: Whistleblower Details

| | |
|--|--|
| Are you an employee of Chubb? | |
| Name (Not mandatory) | |
| Position/Department (Not mandatory) | |
| Contact Number or Email Address (Mandatory) | |

Acknowledgment and Disclaimer

Thank you for your report, which we acknowledge receipt of.

Your report will be reviewed in accordance with our Whistleblowing Policy, other relevant internal policies and procedures as well as the applicable regulations.

Thank you again for raising your concern responsibly.

Appendix C

