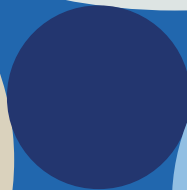
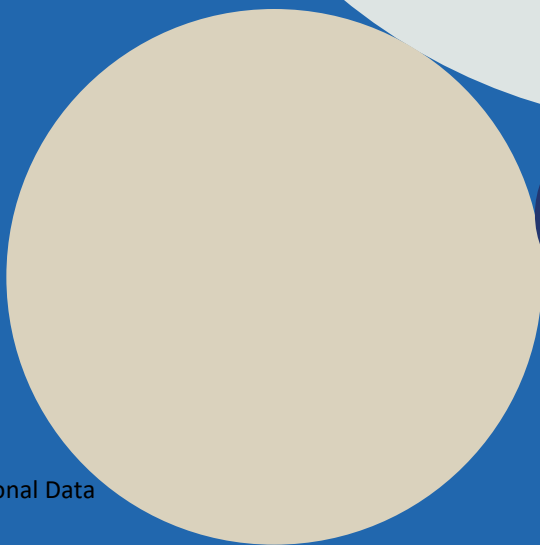
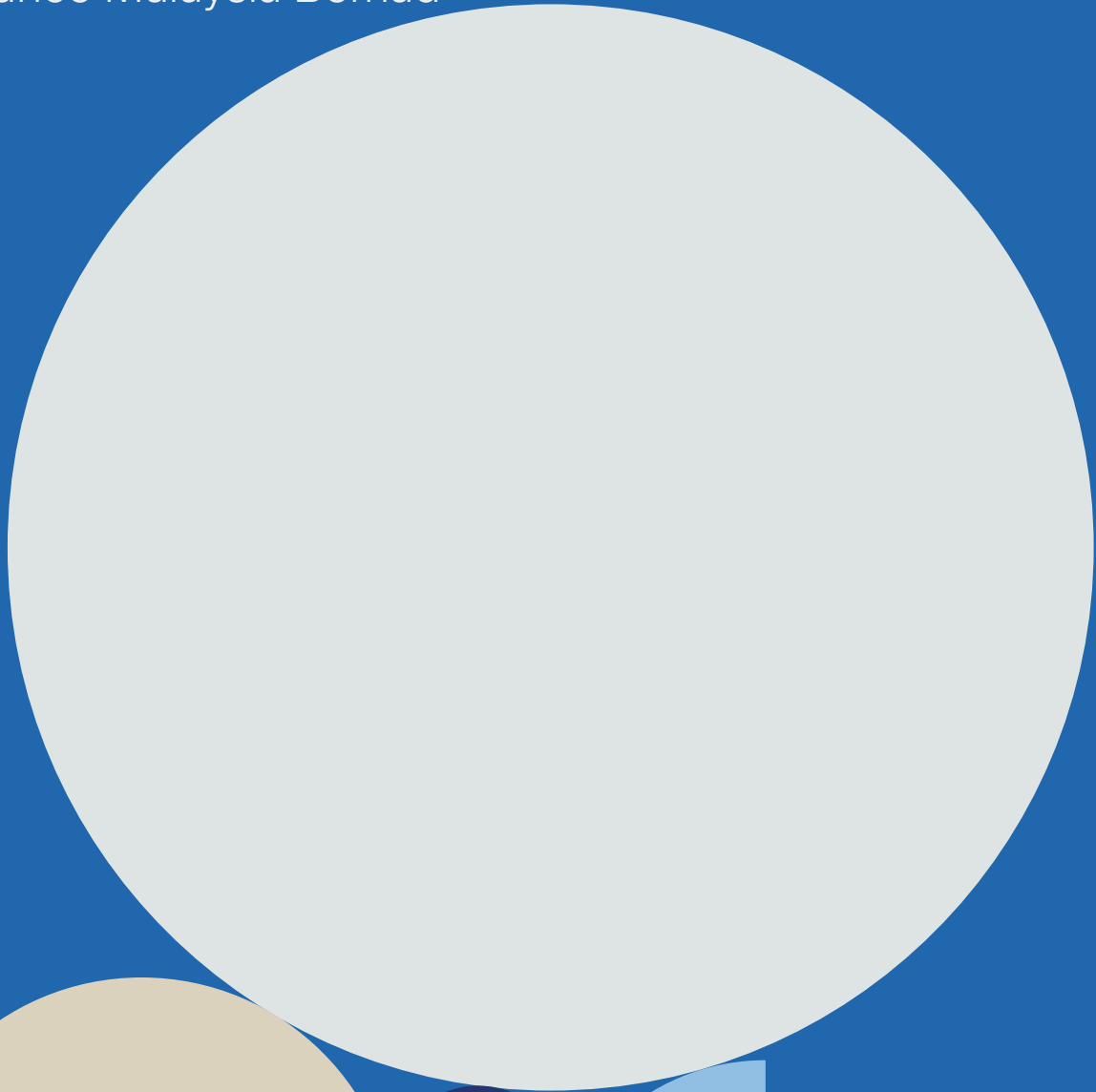


# Speaking Up about Integrity Concerns Policy

Zurich Life Insurance Malaysia Berhad



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## Implementation

This Policy comes into effect as of its publication date (effective date).

## Adherence monitoring

Adherence to this Policy is monitored through the Internal Control Integrated Framework (ICIF) and the Malaysia laws and regulations.

<b>Effective date</b>	March 31, 2025
<b>Approver</b>	Board of Director of ZLIMB.
<b>Document's owner</b>	Local Compliance Officer.
<b>Next scheduled review</b>	2026
<b>Version</b>	3.0 – replaces version 2.0
<b>Summary of changes</b>	<p><u>Prior to 30 June 2024 - Implementation of Group Policy on Policy Governance (GPoPG)</u></p> <p>Version 1.0:</p> <ol style="list-style-type: none"><li>1. The applicability of this local standard has included the Board members;</li><li>2. Introduced new process of Triage Committee;</li><li>3. Adopted and introduce the new form – Open Door Report Form;</li><li>4. Reinforcement of “No retaliation” principle, explanation;</li><li>5. Introduced and described HR related complaints;</li><li>6. Reinforcement of the “Confidentiality and the need to know principle”;</li><li>7. Introduced new section on “conflict of interest” and “communications with the reporting person”;</li><li>8. Updated the description and expectation on the employees and line manager and their responsibilities; and</li><li>9. Updated Local Legal and Human Resources contact.</li></ol> <p><u>Implementation of Group Policy on Policy Governance (GPoPG)</u></p> <p>Version 2.0:</p> <ol style="list-style-type: none"><li>1. Updated the format in accordance to GPoPG;</li><li>2. Include section: Source of authority; and</li><li>3. Include recommendation from External Legal Opinion – minor changes on section 3.1.5 No Retaliation and add section 3.1.7 Other Reporting Channel.</li></ol> <p>Version 3.0:</p> <ol style="list-style-type: none"><li>1. Updated to provide clarity that people managers are the first to engage with on jobs/working conditions and employees can seek guidance and support from HR on these aspects;</li><li>2. Updated to provide clearer guidance on the scope of this local policy and ensure alignment with the Group Policy on Speaking Up about Integrity Concerns;</li><li>3. Updated the responsibilities of people manager and members of Compliance, HR and Legal functions. Additionally, provided reference on the availability of the responsibilities of Local Triage Committee;</li><li>4. To encourage Reporting Persons to provide as much information as possible when reporting anonymously;</li><li>5. Removed the HR Complaints section as the Introduction section provided clarity that people managers are the first to engage with on jobs/working conditions and employees can seek guidance and support from HR on these aspects; and</li><li>6. Provided additional direction on transparency with the Reporting Person and Person Concerned as well as on consequence management, reinforcing that management is responsible for any decision related to consequence management.</li></ol>
<b>Keywords</b>	<i>Integrity Concerns, Reporting Concerns, Reporting Misconduct, Code of Conduct, Zurich Ethics Line, ZEL, Retaliation, Speak up, Integrity, Investigation, Whistle-blower, Triage Committee, wrongdoing</i>

# 1. Introduction

Zurich is committed to a ‘Speak Up’ culture across the organization; a culture marked by an inclusive workplace, so that employees and third parties (includes but not limited to intermediaries, contractors/vendors, consultants, and customers) feels comfortable in sharing their views and questions, but also where everyone feels safe and understands how to report suspected or actual illegal, fraudulent, improper or unethical conduct (“Integrity Concerns”).

Employees are encouraged to communicate directly and openly with colleagues and people managers about any issues or questions they may have. For issues or questions related to our jobs or working conditions, while people managers are the first to engage with, employees can also seek guidance from Human Resources. In the event of a performance-related issue, interpersonal conflict, workload challenge, compensation question and other similar issue, Human Resources can provide the necessary support and resources to help navigate through these situations.

Employees and third parties (includes but not limited to intermediaries, contractors/vendors, consultants, and customers) speak up promptly when they have a good faith belief that any Integrity Concern has occurred.

Zurich does not tolerate retaliation against any employee who reports such Integrity Concerns or participates in any investigation in good faith.

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## 1.1. Source of authority

This Policy derives its authority from the Group’s Code of Conduct and Group Policy on Speaking Up about Integrity Concerns (IC) and incorporates the key local requirements, principles and obligations.

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## 1.2. Purpose

The purpose of this Policy is to provide guidance and clear direction as to how they can report Integrity Concerns, inform people managers of their responsibilities in handling Integrity Concerns and communicate the Group’s stance against retaliation.

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## 1.3. Scope

This Policy provides guidance to employees, Board of Directors and third parties (includes but not limited to intermediaries, contractors/vendors, consultants, and customers) of Zurich Life Insurance Malaysia Berhad (ZLIMB).

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## 1.4. Related documents

This Policy must be read together with the following documents:

### Zurich Requirements:

- Group Policy on Speaking Up about Integrity Concerns (“Group Policy”);
- Speaking Up about Integrity Concerns Standard;
- Guideline on Dealing with Integrity Concerns; and
- Zurich’s Code of Conduct.

### Local Procedures:

- Triage Committee Charter;
- Procedure of Dealing with Integrity Concerns; and
- Local Standard - Manual of Investigative Processes or any amendments thereof.

### Bank Negara Malaysia Policy Documents, Local Regulations and Legislations and the subsequent amendments thereof.

- Policy Document on Corporate Governance;
- Policy Document on Code of Conduct for Malaysia Wholesale Financial Market; and
- Act 711: Whistleblower Protection Act 2010.

## 2. Roles and Responsibilities

As a **Zurich employee** you:

- Speak up about Integrity Concerns;
- Must comply with the requirements of this Policy, Group Policy and Standard;
- Must participate in, and successfully complete trainings where required;
- Must cooperate with internal investigations, subject to local laws and regulations; and
- Must not retaliate against anyone who raises an Integrity Concern with reasonable grounds to believe the information reported was true at the time of reporting.

It is not a requirement that you first report your Integrity Concern to your manager. However, if you choose to do so, your manager must submit it via Open Door Report Form (no later than three business days after receipt) and not conduct his or her own investigation. If you have raised an Integrity Concern with your manager but do not feel as though the appropriate course of action has been taken, please report this immediately through one of the other available channels.

### **Manager Responsibilities:**

- Speak to your employees about the importance of ethical behavior;
- Remind employees of the various channels available to report their Integrity Concerns;
- Leading by example by upholding Zurich's commitment to ethical business conduct;
- Creating an inclusive working environment, promoting open and honest dialogue within their teams;
- If an Integrity Concern is reported directly to you, submit it via Open Door Report Form (no later than three business days after receipt) and refrain from conducting your own investigation; and
- Ensure that no retaliation is taken against any employees who reports an Integrity Concern in good faith.

Compliance, Human Resources, and Legal Functions are responsible for receiving Integrity Concerns from employees and others, submit it via Open Door Report Form (no later than three business days after receipt), serving as members on Triage Committees, and/or serving as investigators if assigned by the Triage Committee.

Responsibilities of the Local Triage Committee are available in the Local Triage Committee Charter and Procedure of Dealing with Integrity Concerns.

## 3. Guidance for requirements of this Policy

### 3.1. Reporting Integrity Concerns

If an employee or other person becomes aware of misconduct or wrongdoing, there are multiple channels to speak up and raise Integrity Concerns, including to people managers, Compliance, Human Resources (HR) and Legal.

The Zurich Ethics Line may also be used by a Reporting Person (defined as the person reporting an Integrity Concern) to report Integrity Concerns either via telephone or online via a web form.

#### **Examples of Integrity Concerns**

Integrity Concerns may include, but are not limited to:

- Fraud, bribery, theft or other crime;
- Financial irregularities;
- Falsification of company business or financial records;
- Misuse of company resources;
- Impermissible gifts;
- Improper destruction of documents;
- Questionable or unethical business practices;
- Violations of our Code of Conduct (unethical conduct) or other Zurich policies;
- Harassment and discrimination; or/and
- Actions that could cause Zurich financial or reputational damage.

### **Providing evidence of misconduct**

Providing evidence of wrongdoing will often assist an investigation but it is not required in order to report an Integrity Concern. Even if you only have a suspicion of wrongdoing, you may still report your Integrity Concern, provided you do so in good faith.

### **Raising issues about your own conduct**

Misconduct can sometimes occur because an employee was unaware at the time that they breached a law, regulation or internal policy, or they simply made a mistake. In such cases, it is always better to speak up to enable Zurich to appropriately address the situation in a timely manner. Failing to report something can make the situation worse.

The facts of each report will always be reviewed objectively to ensure a fair outcome.

If you believe you may have participated in any wrongdoing, the best course of action is to raise the issue as soon as possible through one of the available channels.

### **3.1.1. Zurich Ethics Line (ZEL)**

The Zurich Ethics Line (ZEL) is a reporting channel that allows Reporting Persons to report Integrity Concerns either via telephone (1-800-81-4427) or online via a web form, and to do so anonymously if they choose. The Zurich Ethics Line is managed by an independent third-party provider (NAVEX Global) and is maintained by Group Compliance. The independent third-party employs trained operators to receive reports at any hour of the day and every day of the year. The independent third-party provider documents all reports received and directs them to the appropriate Triage Committee as defined below for review in accordance with Zurich's confidentiality obligations.

When making a report via the Zurich Ethics Line, the Reporting Person may request that the report be initially reviewed at the Group level by a member of the Corporate Center Triage Committee.

Access Zurich Ethics Line (ZEL) website via [Link](#).

### **3.1.2. People managers and Compliance, Human Resources and Legal colleagues**

Employees can raise Integrity Concerns to a people manager or anyone from Compliance, HR or Legal.

People managers, Compliance, HR or Legal colleagues (no later than three business days after receipt) submit the concern using the Open Door Report Form.

### **3.1.3. Open Door Report Form**

The Open Door Report Form, is intended for use by people manager, members of the Compliance, HR and Legal functions to capture any Integrity Concern that has been reported to them (no later than three business days after receipt). Reports submitted via this form will be automatically added to the EthicsPoint Incident Management (EPIM) system for further handling by the respective Triage Committee.

### **3.1.4. Confidentiality and Anonymity**

Zurich treats all reports of Integrity Concerns confidentially on a strict need-to-know basis, including the identity of the Reporting Person as well as the subject of the report (Person Concerned) and others who are part of an investigation. Individuals who are interviewed or asked for information during the course of an investigation are asked to maintain confidentiality as to the interview/request and the reported misconduct.

Zurich mandates that employees and other persons be given the option to report an Integrity Concern anonymously, including by using the Zurich Ethics Line, if they are not comfortable identifying themselves.

When submitting an Integrity Concern, employees are encouraged to provide as much information as possible. This is particularly important when submitting a complaint on an anonymous basis, as failure to provide details may hinder efforts to effectively investigate the issues presented. Employees who choose to report their Integrity Concern anonymously via ZEL will be given a reporting key which enables them to respond anonymously to any questions or comments the investigator has posed. If you report your Integrity Concern in this manner, you should periodically call the hotline or check the website for any updates.

Zurich treats confidentiality and anonymity very seriously and takes appropriate steps to uphold such protections.

### 3.1.5. No retaliation

Zurich does not tolerate retaliation, including threats and attempts of such, against any Reporting Person who reports an Integrity Concern with reasonable grounds to believe the information reported was true at the time of reporting, i.e., in good faith. Thus, when making a report, Reporting Persons do not need to be certain or have definitive proof, but only need to have reasonable grounds to believe that the information reported is true at the time of reporting. If it turns out that they were mistaken, they will not face negative consequences for speaking up and reporting. However, deliberately or knowingly providing false or misleading information when reporting an Integrity Concern or in the course of an investigation (e.g., by a Reporting Person or witness) is not tolerated. Corrective actions, up to and including termination of employment, criminal and/or civil charges and other possible remediation actions, are to be expected. Protection against retaliation is also extended to those who participate in an investigation in good faith (e.g., witnesses) or provide information/evidence in the course of any investigation.

Zurich employees who believe they are victims of retaliation speak up promptly and report retaliatory conduct to Compliance, HR or Legal, or they make a report in the Zurich Ethics Line or through one of the available reporting channels.

Retaliation includes direct or indirect intimidation, threats, harassment or other similar conduct against a Reporting Person, witness or investigator as a result of a report and/or investigation, as well as recommendation, encouragement or condonation of such conduct. Managers condoning or enabling the retaliatory acts of others may also be subject to corrective action, up to and including termination of employment.

Corrective action, up to and including termination of employment, is to be expected for engaging in or tolerating retaliation against a Reporting Person, witness, investigator or other third persons who are connected with the Reporting Person and could suffer retaliation in a work-related context, such as colleagues or relatives of the Reporting Person.

### 3.1.6. Other Reporting Channel

Reporting Persons may report directly to any relevant regulators or law enforcement agencies where deemed appropriate and relevant such as Bank Negara Malaysia, Malaysian Anti-Corruption Commission, Royal Malaysia Police, etc.

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## 3.2. Reviews of Reports

Zurich is committed to reviewing and, if required, investigating all Integrity Concerns, as well as taking appropriate measures in response.

The review of Integrity Concerns is carried out by one of three types of Triage Committee specified below, collectively referred to as “Triage Committees”.

### 3.2.1. Types of Triage Committees

All reports received through the Zurich Ethics Line or any other reporting channels must be reviewed by a Triage Committee. Triage Committees are comprised in general of representatives from Compliance, HR and Legal. The Triage Committees must evaluate every report received, and determine, based on the nature, type and severity of the allegations or suspicions raised:

- whether the matter is an Integrity Concern;
- if an Integrity Concern, whether an investigation is required; and
- if so, which function should investigate and/or undertake next steps.

There are three types of Triage Committees at Zurich:

1. Group Triage Committee;
2. Corporate Center Triage Committee; and
3. Regional and Local Triage Committees.

Malaysia has adopted a hybrid approach of Regional and Local Triage Committee. Reports will be reviewed by the Local Triage Committee, which is comprised of the General Counsel, Chief Human Resource Officer and Chief Compliance Officer. The Local Triage Committee has the responsibility in the first instance for triaging all reported matters other than those raised against Regional level employees. Where a decision cannot be reached by the Local Triage Committee, the decision will be escalated to the Regional Triage Committee which is comprised of the General Counsel APAC, Head of Compliance APAC and Human Resources Business Partner APAC for resolution. The Local Triage Committee will also seek guidance and support from the Regional Triage Committee as necessary.

Matters involving a Group ExCo member, Country CEO or Key Risk Taker will in all instances be forwarded to the Group Triage Committee for evaluation and determining next steps.

Further details are available in the Group Policy and Manual on Dealing with Integrity Concerns.

### **3.2.2. Investigations**

Zurich is committed to conducting investigations of Integrity Concerns in a timely, thorough and professional manner, consistent with all local laws and regulations, and in a way that will gather the facts necessary to allow for an assessment of the issue raised.

Employees and reporting parties have a responsibility to cooperate with investigation, subject to local laws and regulations. People manager must submit via Open Door Report Form (no later than three business days after receipt) and must not conduct their own investigations.

All participants in the investigation, including the Reporting Person and the person who is the subject of the report, must be treated with equal respect, fairness and consideration.

Corrective actions, up to and including termination of employment, criminal and/or civil charges and possible remediation actions, are to be expected if any wrongdoing is found.

### **3.2.3. Conflicts of interest**

If members of a Triage Committee are in an actual or perceived conflict of interest, they must recuse themselves from the triaging process.

At no time can an investigation into allegations directed at a function be assigned to that same function to investigate. However, representatives from that function at the Group or Regional level could be given responsibility for such an investigation, consistent with local laws and regulations applicable at that point in time.

### **3.2.4. Remediation, Communication and Consequence Management**

Zurich is committed to a fair, consistent and transparent approach to remediation of Integrity Concerns.

If required during the course of an investigation, the Triage Committee and/or the investigator will be in contact with the Reporting Person and the Person Concerned at different stages. Subject to legitimate considerations of Zurich, the Reporting Person will also be informed at the conclusion of an investigation. Such communication will be carried out anonymously via the Zurich Ethics Line tool if the Reporting Person has raised an Integrity Concern anonymously through the Zurich Ethics Line. While the aim is to be transparent, some information about the investigation will need to remain confidential.

If the review of an Integrity Concern results in a determination of improper behavior, appropriate remediation will be undertaken. The potential consequences for individuals who engage in such improper behavior includes termination of employment, and/or the filing of criminal and/or civil charges.

## **4. Reporting**

Further information and guidance on Integrity Concerns can be found by contacting your Compliance Function at [compliance.integrity@zurich.com.my](mailto:compliance.integrity@zurich.com.my), Human Resources at [hr.integrity@zurich.com.my](mailto:hr.integrity@zurich.com.my) or/and Legal Function at [alan.ho@zurich.com.my](mailto:alan.ho@zurich.com.my).