

RHB BANKING GROUP'S GROUP WHISTLEBLOWING POLICY

Policy Statement

RHB Banking Group (“Group”) expects all employees of the Group to act in accordance with the highest standard of professional integrity in all aspects of their activities and to comply with all applicable laws, regulations, internal policies and guidance. As part of this commitment, RHB has in place an avenue for disclosure of any improper conduct or wrongful act. This policy is applicable to all entities within the Group, including overseas branches and subsidiaries.

Objective

The objective of this policy is to provide a proper mechanism and minimum standards to be adhered by entities across RHB Banking Group (“Group”) in dealing with disclosure on questionable actions or wrongdoings by any personnel in the Group and the Group’s Business Partners. It aims to encourage personnel to raise their concerns without fear of reprisal, allows for early detection of unlawful and unethical conducts and it helps nurture a culture of accountability.

Scope

The following are examples of improper acts, wrongdoings and misconducts which are generally accepted for any RHB personnel or business partners to whistleblow, of which the list is non-exhaustive:

- Any fraud, unlawful civil or criminal act;
- Any act of dishonesty, corrupt, abuse of power or authority for personal financial gain, any unauthorised or ulterior purpose;
- Any breach of RHB Group’s Codes including Group’s Code of Ethics and Conduct for Employees, and violation of laws, rules and regulations governing the business and operations of the Group;
- Any malpractices or misdeeds, such as unethical or unlawful activity with regards to privileged information and material non-public information, market manipulation, rogue trading, market rigging, credit fraud, forgery, misappropriation of funds and/or assets, and any other unprofessional conduct that is in violation of laws, rules, regulations and Codes;

- Any unethical or questionable acts that pose or lead to health and safety risks, sexual or physical abuse, retaliation or retribution against the whistleblower and other similar acts; and
- Any creation of misleading, dissemination of misleading and/or false financial records.

This Policy does not apply to personal grievances concerning your employment. Such matters shall be dealt with under our Human Resource Policies and Procedures.

Key Principles

The key principles of the Group Whistleblowing Policy are:

No.	Principle
Principle 1	The Group has zero tolerance on any form of fraudulent misconducts, corrupted acts or major business and human rights violations, in line with the Codes (all ethics-related codes within the Group) and the Group’s shared values.
Principle 2	The Boards and the Senior Management must give full commitment in leading the Group and its Personnel towards a culture of integrity, openness, compliance and disclosure.
Principle 3	The Group must provide assurance and protection to the whistleblowers who report discreetly in bona fide (good faith) on unethical behaviors and business misconducts within the organisation or of its business partners.
Principle 4	The whistleblower must provide basic information on the alleged unethical behaviors and business misconducts, including his/her own personal information, to be qualified as the Group’s registered or formal whistleblowing reports.

No.	Principle
Principle 5	All whistleblowers must escalate the alleged unethical behaviors and business misconducts through the approved formal channels and avenues as provided by the Group.
Principle 6	The Group retains the prerogative in all instances to determine when circumstances warrant an investigation (after due deliberation and evaluation processes) and the appropriate investigative process to be employed in line with the relevant policies, laws and regulations.
Principle 7	The Group must have clear investigation procedures and process to handle investigation of whistleblowing cases.
Principle 8	The Group must have proper record-keeping on all the reported cases of whistleblowing and maintain a high degree of confidentiality on such reports.
Principle 9	The Group must be transparent on disclosure of reported whistleblowing cases and the outcome of cases being investigated, in line with good governance practice.
Principle 10	The Group must periodically conduct awareness and communicate to its personnel and business partners on the availability of formal channels and avenues for whistleblowing.

Disclosure Avenues

Anyone can raise a concern or report a wrongdoing/ misconduct via the following approved e-mail or mailing address:

Designated Recipients E-mail Address

Group Integrity & Governance	speakup@rhbggroup.com
Senior Independent Non-Executive Director	donald@rhbggroup.com
Group Chairman	ahmad.badri@rhbggroup.com

Designated Recipients E-mail Address

Chairperson of the Board Audit Committee	bacchairman@rhbggroup.com
Group Managing Director	mohd.rashid@rhbggroup.com
Group Chief Internal Auditor	tan.boon.ching@rhbggroup.com
Group Chief Legal & Governance Officer	azmanshah@rhbggroup.com

Mailing Address

Sealed letter addressed to:
<Name of Designated Recipient>,
d/a Group Integrity & Governance,
RHB Bank Berhad,
Level 10, Tower One,
RHB Centre, Jalan Tun Razak,
50400 Kuala Lumpur, Malaysia.

We appreciate your co-operation to ensure that the whistleblowing reporting channel is only used for the purpose of reporting matters involving misconducts highlighted in this document.

Non-Whistleblowing Disclosure

RHB Customer Advocacy is an independent team within the Bank dedicated to supporting customers with their feedback and concerns and remain committed to supporting you every step of the way. You may reach the team through the following channels:

Recipients	E-mail Address
Customer Advocacy	customer.advocacy@rhbggroup.com
Head, CX Advocacy and Complaint Resolution	rajini.nadarajan@rhbggroup.com
Lead, CX Advocacy and Support	asnida.abdul.razak@rhbggroup.com

Contact Detail: +603-9206 8090

Operating Hours:

Monday to Thursday: 8:45 a.m. – 5:45 p.m.
Friday: 8:45 a.m. – 4:45 p.m.

You will receive an immediate acknowledgement, and our team will respond within one business day

Other Disclosure Avenues

Alternatively, the whistleblower may report directly to relevant government or regulatory authorities and enforcement agencies in Malaysia, not limited to the following:

Bank Negara Malaysia	https://www.bnm.gov.my/whistleblowing-policy
Securities Commission	https://www.sc.com.my/investor-empowerment/lodge-a-complaint
Malaysian Anti-Corruption Commission	https://portaladuan.sprm.gov.my/

Details to be Provided

Whistleblowers are encouraged to include the following information in their disclosure to the relevant designated recipients of the whistleblowing report:

- Whistleblower's name and contact details such as telephone number and/or e-mail address;
- Details of the allegation including where and when the alleged misconduct/ wrongdoing took place;
- Details of the person(s) involved;
- Details of witnesses, if any;
- Other relevant information; and
- Any supporting evidence (if available).

Whistleblower Protection

RHB Banking Group commits to ensure that all disclosed information, including the identity of the whistleblower shall be kept confidential, unless so required under the provisions of the law or policy or when the Group Whistleblowing Policy's requirements are not adhered to.

In situations where the disclosure of an improper conduct is found to be frivolous or vexatious, known to the whistleblower to be false or untrue or made solely or substantially to avoid dismissal or other disciplinary action, the Group reserves the right to revoke or exclude the protection offered to the said whistleblower.

Kindly note that all the protections assured under the Whistleblower Protection Act 2010 will only be accorded to the whistleblowers who report directly to the relevant enforcement agencies.