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CODE OF CONDUCT

1.0 Introduction

This Code of Conduct and its related policies ("**Code**") sets out the standards for appropriate ethical and professional behaviour for all employees of SYMPHONY LIFE Berhad ("**Symphony Life**" / "**the Company**") and its group of companies ("**Symphony Life Group**" / "**the Group**"). It is applicable to all employees and agency or contract employees engaged in a similar capacity as Symphony Life employees.

While the Code cannot possibly cover every situation we may encounter, it does outline key responsibilities in critical areas to guide the Group's employees. Employees should familiarise themselves with the contents of this Code and should act in accordance with the principles set out in it. Contravention of this Code is a serious matter and may subject you to disciplinary procedures as set out in Section 4 of this Code.

2.0 Purpose Of This Code

- To uphold the good name of Symphony Life and to maintain public confidence.
- To design a harmonious work place for all staff irrespective of levels.
- To maintain a high standard of personal integrity and professionalism.
- To outline appropriate actions that may be taken against any staff who have been found to violate these policies or any policies of the Company.

3.0 Conduct

This section sets out the policies and guidelines relating to the standards of conduct expected from the Group's employees in the course of work within the Group or when they are carrying out official responsibilities and duties assigned outside the workplace:

3.1 Conflict of Interests

All employees must observe the highest standards of ethical behaviour in the course of their work to ensure that public confidence and trust is maintained and to avoid a conflict of interest. The Group and all its employees must be above suspicion and beyond reproach, and must be perceived in this manner.

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3.1.1 Acceptance of Gifts

Employees must not use their official position to receive, agree to accept or attempt to obtain any payment or other consideration for doing, or not doing, anything or showing favour, or disfavour, to any person. They must not receive benefits of any kind from a third party which might reasonably be seen to compromise their personal judgment and integrity.

3.1.2 Additional Employment or Business Activity

Employees, during their employment with the Group, are to devote the whole time, attention, energies and skills solely to the business of the Group, and must use their best endeavours to promote the Company's interest. An employee is not permitted to engage directly or indirectly in any other business or occupation whether as principal, agent, servant or broker while still in the employment of the Group unless such business or occupation has been disclosed to the senior management of the Company. In any event, such business or occupation must not be in conflict with the Company's interest. He is also not permitted to engage in any activity, which can be detrimental, directly or indirectly, to the interest of the Group.

An employee is not allowed to participate in or influence the purchase of goods, contracts and services from any company or person in which or through which that employee has or will obtain a direct or indirect interest or benefit.

3.2 Disclosure of Official Information

3.2.1 Confidential and Proprietary Information

Employees must keep secret and must not during their employment with the Group or after cessation of employment disclose to anyone outside the Group, without prior written consent of the Company, all confidential and proprietary information relating to the business of the Group which are gained through their knowledge as a result of their employment by the Company and employees must use their best endeavours to prevent such disclosure.

Such confidential information shall include trade secrets, designs and concepts, consultants, contractors, purchasers, price lists, cost information, financial information, business and research plans and other commercially valuable information of any kind which an employee has access to whilst in the employment of the Group.

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If an employee is found to have divulged or have caused to divulge or to have failed to use his endeavours to prevent the disclosure of such confidential information, the Company reserves the right to terminate the contract of employment forthwith without notice and/or take appropriate legal action against the defaulting employee.

3.2.2 Intellectual Property

If, during the tenure of employment with the Company, an employee either alone or jointly with any other person makes or devices an invention, process of improvement, software programs, technique, method of the manufacture or formula, he must disclose truly and fully to the Company and deliver to the Company all documents, working papers, specifications, software programs or formula pertaining to the above, which may be in his control, possession or custody.

3.2.3 Public Statements

No employee is allowed to issue statements orally or in writing or in any other form about policies of the Group or on any other matters concerning the Group without prior consent from the Company.

3.3 Discrimination and Harassment

The Company is committed to providing a safe and healthy working environment that fosters mutual respect among employees, irrespective of status or position. All employees will be treated fairly, with dignity and respect and free from discrimination or harassment. The Company does not tolerate any form of harassment (sexual or otherwise) or discrimination, including behaviour, comments, jokes, slurs, e-mail messages, pictures, or other conduct that contributes to an intimidating or offensive environment. All employees must be mindful of the social ramifications of their actions.

3.3.1 Discrimination

All forms of discrimination are prohibited. The Company is committed to equal opportunity, personal rights and freedom, in all aspects of its operations.

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3.3.2 Harassment

All forms of harassment are prohibited. The Company does not tolerate any form of abusive or coercive behaviour, whether verbal or otherwise or physical violence among its employees.

Employees are prohibited from engaging in any form of harassment, humiliation and intimidation of a sexual nature. Sexual harassment may be perceived as placing condition(s) on his employment or may not be directly link to his employment. Sexual harassment does not only occur between different sexes but also of the same sex. Please refer to the Appendix A – Sexual Harassment Complaint Procedures, for more information on this matter.

3.4 General Conduct

3.4.1 Attendance/Punctuality

All employees are required to observe the stipulated working hours and/or shift hours of the Company and department respectively. If an employee is unable to commence work on time, he must make every effort to inform his superior at the earliest possibility not later than three (3) hours after commencement of work on that day.

The attendance is monitored through the key pad reader placed at the entrance to the respective offices at Head Office and attendance book at site offices. If an employee is late for work for more than three (3) occasions in a month, an appropriate caution letter will be issued to the employee concerned. If he persists in being late and without reasonable reason, he shall be subject to disciplinary action. For the purpose of this section, "reasonable reason" shall be construed as a reason which is not, in the opinion of the Human Resources Department, frivolous or inconsequential.

An employee who is unable to attend work because of illness shall submit his original medical certificate to the Human Resources Department not later than two (2) working days after returning to work.

An employee must not, without good reason, be continuously absent from work for more than two (2) consecutive days without having obtained prior approval for leave from his relevant superior. If the employee is not able to obtain such prior approval, he must inform his superior or the Human Resources Department of the reason for such absence at the earliest opportunity during such absence.

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An employee shall be deemed to have broken his contract of service with the Company if he has been continuously absent from work for more than two (2) consecutive working days without prior leave from the Company, unless he has a reasonable excuse for such absence and has informed or attempted to inform the Company of such excuse prior to or at the earliest opportunity during such absence.

Employees must make every effort to inform the Human Resources Department soonest of his lateness or absence from work.

3.4.2 Appearance

All employees must be suitably attired and groomed at all times at the workplace or while they are carrying out official responsibilities and duties assigned outside the workplace in order to project a good image and professional outlook for the Group.

Their clothing and grooming should reflect what is appropriate to their jobs, the work environment and personal safety.

Employees who are provided with uniforms are expected to wear their uniforms during working hours.

All employees must adhere to the dress code as prescribed by the Company:

- T-shirts, jeans, shorts, bermudas, khaki pants, sports shoes, sandals or sneakers are not acceptable attire during working hours.
- Male employees are encouraged to wear pastel or light coloured long-sleeved shirts during working hours except at site/field work. However, male employees are required to don ties when the employees has business meeting to attend on that day.
- Female employees are required to wear skirts or tailored pants / suits during office hours.
- Female employees are not allowed to wear transparent blouses, spaghetti straps, t-shirts, draw string pants, tight fitting pants or such other inappropriate attire.
- Female employees are required to wear court shoes or shoes with straps behind the heels in the office at all times during office hours.

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3.4.3 Insubordination and Inefficiency

An employee must not commit any act of willful refusal, insubordination or disobedience of any lawful and reasonable instruction of his superior/manager/department heads. This shall also include refusal to perform duties assigned, being inefficient and intentionally slowing down work causing the quality and/or quantity of work to be adversely affected.

3.4.5 Professional Conduct

All employees must observe and adhere to the highest standards of professional conduct at all times with integrity, propriety and decorum and must not, under any circumstances, commit any act or omission that would bring damage to the Company, its property, reputation or general interest.

3.5 Whistle Blowing

It is a fundamental term of every contract of employment that an employee will faithfully serve his or her employer and not disclose confidential information about the employers' affairs. Nevertheless, where an employee discovers information which they believe shows serious malpractice, wrongdoing or breach of this Code within the organisation then this information must be disclosed via the appropriate channel. Please refer to the Appendix B - Policy on Whistle Blowing for detailed information on this matter.

4.0 Disciplinary Actions

While in service, you are required to exercise self discipline in observing the rules and regulations of the Group in order to maintain fair and impartial treatment. Disciplinary action, where necessary, is directed more towards corrective action rather than punishment.

Depending on the nature and seriousness of the misconduct/offences committed, below are the following courses of disciplinary action(s) which may be taken in order of gravity:

- Verbal Advice/Counselling
- Advice Letter
- Warning Letter
- Suspension
- Dismissal/Termination

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a) Verbal Advice/Counselling

The purpose of counselling is to correct an employee's unacceptable behaviour and to prevent the behaviour from deteriorating to the point where written warnings are given. By complying with the verbal advice, the employee is assured that the matter is deemed resolved without further disciplinary action. Otherwise the employee will be subjected to the next course of disciplinary action.

b) Advice Letter

Following the verbal counselling, an employee who repeats a similar offence within three (3) months from committing the first offence, will be issued a letter of advice against committing the offence or similar offence in the future.

c) Warning Letter

If an employee persists in committing similar offence subsequent to receiving an advice letter, the employee will be issued a warning letter. An employee's conduct will be continuously monitored and reviewed by his superior following the issuance of a warning letter.

d) Suspension and Dismissal/Termination

An employee who continues to show no improvements or violates the rules and regulations of performance and conduct despite the above preliminary steps described, may be subjected to dismissal. In any event, a thorough inquiry / investigation will always be conducted before a dismissal is recommended. If an employee is suspended during the said inquiry / investigation, which will not exceed two (2) weeks, the employee will be paid half of his wages. If the inquiry/investigation finds the employee guilty, any of the following will be recommended:

- i) Dismissal; or
- ii) Further suspension not exceeding one (1) week, without wages; or
- iii) Down-grade the employee; or
- iv) Impose any other lesser punishment as the Company deems just and fit.

If the employee is found not guilty, he will be reinstated with full pay.

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5.0 Categories of Offences

It is impossible to give an exhaustive list of the activities that constitute misconduct or a breach of this Code, but broadly speaking, some of the examples of misconduct are listed below:

Category I (Misdemeanour and Minor Offences)

- a) Insubordination or disobedience of any lawful and reasonable instructions of his superior.
- b) Gross inefficiency of work.
- c) Slackness or laziness.
- d) Ceasing work before the stipulated end of working hours.
- e) Late attendance.
- f) Quarrelling with co-workers or superiors creating rowdy scenes, threatening and indulging in abusive or vulgar language during or outside working hours within the Company's premises.
- g) General misconduct, particularly incurring and failure to repay debts (other than from legal financial institutions) resulting in adverse public image for the Company.
- h) Leaving their work place without permission of his superior during working hours.
- i) Loitering within or adjacent to the Company's premises.
- j) Entertaining private visitors without permission of his superior.
- k) Inciting or aiding another employee to commit any of the above offences.
- l) Improperly dressed (not adhering to Company's dress code).

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- Verbal warning (Verbal Advice/Counselling for the first offence)
- Advice letter for the second offence
- Warning letter for the third offence
- Suspension/Dismissal for the fourth offence

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Category II (Serious Misconduct and Offences)

- a) Deliberate slowing down in performance of work, malingering or abetment or instigating others to do so or interference with the work of other employees.
- b) Gross negligence resulting in damage to the Company's property or in financial loss to the Company.
- c) Misuse of time-cards, punching in or off, for another employee.
- d) Failure to report to the Company's doctor of infection or contagious disease.
- e) Absence without approved leave or medical certificate for more than two (2) consecutive working days.
- f) Being intoxicated or under the influence of drugs on the Company's premises or involvement in any form of drugs related activities.
- g) Inciting another employee to fight.
- h) Threatening to cause physical harm or injury to any member of the staff or their families or intimidation of whatever nature.
- i) Causing or instigating discontent among employees against the Company or officers of the Company.
- j) Failure or refusal to observe any of the Safety and Health Rules, Fire Prevention Rules, Security Rules and other regulations of the Company.
- k) Failure or refusal to submit to a search which is necessary in facilitating an investigation when requested to do so by the Company's authorised employee.
- l) Refusal to observe any of the provisions of this Code.
- m) Disclosing to an unauthorised person any commercial or trade secrets, manufacturing processes or information of a confidential nature concerning the affairs of the Company, without the prior permission of the Company.
- n) Holding of an unauthorised meeting in the Company's premises.
- o) Smoking in prohibited areas.
- p) Inciting or aiding another employee to commit any of the above offences.

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Punishment

- Liable to dismissal

Category III (Very Serious Offences)

- a) Stealing or carrying stolen goods.
- b) Deliberate damage to Company's property.
- c) Fighting with or striking another employee within the Company's premises.
- d) Gross insubordination.
- e) Sleeping on duty.
- f) Committing an immoral act within the Company's premises.
- g) Falsification of any Company's records or documents.
- h) Participating in an unlawful strike.
- i) Picketing in Company's premises or land.
- j) Erection or display of banners, notices, etc on the Company's property without prior permission.
- k) Unauthorised distribution of notice, leaflets, etc concerning the Company either within or outside the Company's premises.
- l) Embezzlement of the Company's fund.
- m) Gambling or soliciting for fund on the Company's property without written approval of Management.
- n) Attempting or making false, improper or excessive claims to the Company.
- o) Taking or giving bribes or any illegal gratification.
- p) Inciting or aiding another employee to commit any of the above offences.

Punishment

- Dismissal

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6.0 Grievance

A grievance shall be defined as a complaint by an employee which he brings to the attention of his immediate superior and which is subsequently not settled to the satisfaction of the employee. It is agreed that an employee shall have no grievance until he has given to his immediate superior an opportunity to ratify the said grievance.

6.1 Grievance Procedure

The grievance procedure will be as follows: -

- i) An employee who has a work related complaint shall submit his grievance in writing to his immediate superior. If the employee fails to obtain settlement from his immediate superior within three (3) working days, or within any longer period which may be mutually agreed upon in writing at that time, he may refer his grievance to his superior within a further period of three (3) working days. At this stage, he may, if he so wishes, be accompanied by another employee to help explain his case.
- ii) If the employee still fails to obtain settlement within five (5) working days, of invoking the above he may within a further period of five (5) working days refer his grievance in writing to the Head of Department. He may, at this stage, if he so wishes, be accompanied by another employee to help explain his case.
- iii) If the employee still fail to obtain settlement within five (5) working days, or within any longer period which may be mutually agreed upon in writing at that time, he may within a further period of five (5) working days appeal in writing to the Executive Chairman (Hereinafter Executive Chairman shall also refer to such other person holding the highest ranking executive position in the Company).
- iv) Any grievances which are not presented by an employee to his immediate superior within three (3) working days from the date of occurrence of the alleged grounds for complaint or where a time limit has been specified in the grievance procedure and has not been complied, shall be considered null and void.

The decision of the Company upon settlement of the grievance shall be final.

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6.2 General Provisions

Recognising the value and the importance of full discussion in clearing up misunderstanding and preserving harmonious relations, every possible effort shall be made by all parties to deal with any enquiries or complaints from an employee at the lowest possible level.

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APPENDIX A – COMPLAIN PROCEDURES IN RELATION TO SEXUAL HARASSMENT

1.0 Forms of Sexual Harassment

Sexual harassment may, amongst others, be in the following form:

Verbal	Comments, jokes, teasing, offensive remarks, discussions of sexual activities.
Non-verbal	Gesture, hand signal, sign language denoting sexual activity, flirting.
Visual	Showing pornographic materials through any medium, writing sexual suggestive words.
Physical	Hugging, grabbing, kissing, fondling, inappropriate touching, pinching, stroking, coerced sexual intercourse or sexual assault.

2.0 Complain Procedure

2.1 Who To Lodge Complain To

- 2.1.1 Employees are encouraged to first lodge their complain with their immediate superior or Head of Department.
- 2.1.2 If, for whatever reason, an employee is unable to lodge their complain with his/her immediate superior or Head of Department, all matters or concerns shall then be raised directly to the Head of Human Resources or the Executive Chairman (Hereinafter Executive Chairman shall also refer to such other person holding the highest ranking executive position in the Company). In any event, the Executive Chairman will be notified of such complaint within three (3) days from the receipt of the complaint.

2.2 How To File A Complain

- 2.2.1 Owing to its sensitivity, the Company will ensure that these complaints are dealt with seriously. Employees who believe they have been sexually abused are to write a formal complaint within seven (7) days of occurrence of such incident.
- 2.2.2 Employees must lodge their complaint in writing.

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2.2.3 Employees who wish to make a report should furnish the following information:

- date, time and venue of such allegation.
- provide multi media and/or written document(s) as evidence.
- name(s) of witness(s) if possible.
- name(s) of the alleged employee(s).

2.3.4 All complaints will be treated with strict confidentiality and a copy of the complaint will be filed with the Human Resources Department.

2.3.5 On receipt of such written report, the person receiving the report will reply to the complainant:

- acknowledging the report has been received.
- indicating how the Company proposes to deal with the matter.
- giving an estimate time frame to provide response.
- to advise whether there is bona fide and if not, why.

2.3.6 In circumstances where concerns are reported to the employee's immediate superior or Head of Department, the said person shall refer the matter to the Head of Human Resources or the Executive Chairman within three (3) days. For avoidance of doubt, the Executive Chairman must be notified of all reported concerns.

2.3.7 All Managers have an absolute responsibility to act on the concerns reported. Failing to adhere to the above is a disciplinary offence.

2.4 How A Complaint Will Be Handled:

2.4.1 Once a complaint is filed, the Company will investigate the complaint fairly, expediently and discreetly.

2.4.2 Measures will be taken to ensure that the Complainant does not suffer any embarrassment and or further harassment.

2.4.3 Upon receiving the complaint, the Human Resources Department will set-up an independent investigating team to investigate the complaint.

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- 2.4.4 All complaints received will be investigated as soon as possible, in any event within 14 days from the date the complaint is received.
- 2.4.5 If the investigating team finds the complaint justified, a Domestic Inquiry will be held and disciplinary action will be taken against the alleged employee(s), if found guilty.
- 2.4.6 If the investigating team finds the complaint is justified but could not be resolved within 14 days, it will be referred to the Head of Human Resources or the Executive Chairman for forward action.
- 2.4.7 If the investigating team finds a false, malicious or vexatious complaint has been filed, disciplinary action will be taken against the complainant.
- 2.4.8 If the investigation is a prolonged one, the investigating officer should keep the complainant informed, in writing, as to the progress of the investigation and as to when it is likely to be concluded.
- 2.4.9 Follow-up actions must be done to ensure the complainant is satisfied and the harassment stopped. If the complainant is not satisfied that his/her concern is being properly dealt with by the investigating officer, they have the right to raise it in confidence with the Head of Human Resources or the Executive Chairman.

2.5 What Happens After The Investigation

- 2.5.1 The Head of Human Resources or Executive Chairman will ensure that the findings of the investigation are communicated to:
- the Complainant;
 - the individual(s) under investigation; and, if appropriate;
 - the designated management of the Symphony Life Group; and
- 2.5.2 Where necessary the Company will provide support, counselling or mediation in order to ensure normal working relationships are resumed as effectively as possible.



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3.0 Disciplinary Action

All employees, irrespective of status or position, will be subjected to disciplinary action, including dismissal, if found to have committed such act after due enquiry. Employees who make false, malicious or vexatious allegation will similarly be subjected to disciplinary action, including dismissal, if found to have made such allegation after due enquiry. However, if an employee makes a bona fide allegation of sexual harassment in **good faith**, which is not confirmed by subsequent investigation, the employee will not be subjected to disciplinary action.



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APPENDIX B – WHISTLE BLOWING POLICY**

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CODE OF CONDUCT APPENDIX B – WHISTLE BLOWING POLICY

1.0 Introduction

Symphony Life Berhad ("**Symphony Life**" / "**the Company**") and its group of companies ("**Symphony Life Group**" / "**the Group**") are committed to the highest standards of ethics, integrity and accountability. An important aspect of this is a mechanism to enable employee and other members of the Group to disclose internally any serious malpractice or misconduct without fear of reprisal. As such, the Company has introduced and endorsed this Whistle-Blowing Policy ("**Policy**"), which provides a safe and acceptable platform for employees and other members of the Group to channel their concerns about illegal, unethical or improper business conduct affecting the Group.

This Policy allows the Company to take appropriate preventive and corrective actions inside the Group without the negative effects that come with public disclosure, such as loss of Company image or reputation, financial distress or loss of investor confidence.

It should be emphasised that this Policy is intended to assist employees who believe they have discovered malpractice or impropriety. It is not designed to question financial or business decisions taken by the Group nor should it be used to reconsider any matters which have already been addressed under harassment, complaint, disciplinary or other procedures. The person making the allegation must take note that appropriate disciplinary or legal action may be taken against him/her if he/she makes an allegation which he/she KNOWS is untrue. However, if the person makes an allegation which he/she BELIEVE IN GOOD FAITH is true, but it is not confirmed by subsequent investigation, no action will be taken against him/her.

Once the whistle-blowing procedures are in place, it is reasonable to expect the Group's employees to use them rather than air their concerns outside the Group.

2.0 Purpose of This Policy

- To encourage and enable employees to raise genuine and legitimate concerns internally (and also to define clearly the situations in which they may raise the matter externally), without fear of reprisal.
- To allow employees to raise matters in an independent and unbiased manner;
- To provide an opportunity for those concerns to be investigated and for appropriate action to be taken to ensure that the matter is resolved effectively within the Group wherever possible;
- To deter, prevent and detect serious malpractice; and
- To promote accountability throughout the Group.

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3.0 Scope of This Policy

3.1 Who Is This Policy For

This Policy applies to all employees irrespective of the nature of their contract (ie. permanent and contract employees of the Group). It also applies to external consultants, contractors and agency employee whilst working within the Group.

3.2 What Types of Concerns Are Covered

It is impossible to give an exhaustive list of the activities that constitute misconduct or malpractice but, broadly speaking, some of the examples of serious concerns covered by these procedures of which the Company would expect employees to report are as follows:

- an offence or breach of any statutory instrument or legal obligation;
- abrogation of appropriate procedures;
- improper or unauthorised use of company or other funds;
- fraud and dishonesty;
- financial irregularity and intentional misrepresentations directly or indirectly affecting financial statements;
- malpractice;
- corruption and bribery;
- a serious breach of fundamental internal control;
- breach in Symphony Life's Code of Conduct, including serious non-professional or non-ethical behaviour;
- danger to the health or safety of any individual or the environment;
- all other cases involving conduct which appears likely to harm the reputation of Symphony Life Group and is primarily for concerns where the interests of others or of the organisation itself are at risk; and
- the deliberate concealment of any of the above.

These examples are not intended to be exhaustive.

3.3 What Types of Concerns Are NOT Covered

- This Policy is **NOT** intended to replace existing grievance procedures and normal work communication channels for routine issues which may arise from day to day business.
- This Policy is **NOT** a channel for employee to raise matters in relation to their terms and conditions of employment.

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- This Policy is **NOT** an appeal mechanism for other procedures, unless exceptionally, an employee has been through the other procedure and has reasonable grounds to believe that procedure was compromised.

4.0 Guardian of This Policy

The principal party acting as guardian to this Policy is the **Executive Chairman** (Hereinafter Executive Chairman shall also refer to such other person holding the highest ranking executive position in the Company).

5.0 Safeguards

5.1 Protection

The Company recognises that the decision to report a concern can be a difficult one to make.

The Company will not tolerate any harassment or victimisation (including informal pressures) and will take appropriate action to protect any employee who raises a concern in good faith. If an employee raises a genuine concern, he/she will not be at risk of dismissal or suffer any form of retribution, **PROVIDED** the disclosure is made:

- in good faith;
- in the reasonable belief of the employee making the disclosure that it tends to show malpractice or impropriety and if they make the disclosure to an appropriate person; and
- in accordance with the whistle-blowing procedures set out in this Policy.

It is important to note that no protection from internal disciplinary procedures is offered to employees who choose not to use the procedure set out in this Policy. In an extreme case, malicious or wild allegations could give rise to legal action from the part of the persons complained about.

Note: Employees are also afforded protection under the recent amendment to the Companies Act, Sec 368B of Companies (Amendment) Act 2007.

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5.2 Confidentiality

The employee making an allegation/raising a concern (“**the Complainant**”) is assured under this Policy that all steps will be taken to maintain his/her confidentiality. The Company will treat all such disclosures in a confidential and sensitive manner. The identity of the Complainant will be kept confidential so long as it does not hinder or frustrate any investigation. However, the investigation process may reveal the source of the information and the employee making the disclosure may need to provide a statement as part of the evidence required.

In any event, only those investigating the case will know the identity of the Complainant. The Company will not reveal the identity of the Complainant outside this Group except:

- where the Company are under a legal obligation or required by regulators to do so;
- where that information is already in the public domain;
- on a strictly confidential basis to a professionally qualified lawyer or accountant for the purposes of obtaining advice; or
- to the police or as otherwise required by any statutory bodies or required act.

5.3 Anonymous Allegations

This Policy **STRONGLY** encourages employees to put their name to any disclosures they make. If the person making the allegation does not reveal his/her identity, it will be much more difficult for the Company to investigate the case, protect his/her position, and give him/her feedback.

However, the Company may, at its sole discretion, consider anonymous allegations. In exercising this discretion, the factors to be taken into account will include:

- the seriousness of the issues raised;
- the ability of the Company to discover the facts;
- justification for maintaining anonymity; and
- the likelihood of confirming the allegation from attributable sources.

In any event, the person making the anonymous allegation must provide contact details and the information as set out in paragraph 6.2.3 below.

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5.4 Untrue Allegations

If an employee makes an allegation in **good faith**, which is not confirmed by subsequent investigation, the employee is protected. In making a disclosure, the employee should **exercise due care** to ensure the accuracy of the information. If, however, an employee makes malicious or vexatious allegations, and particularly if he/she persists with making them other than via the proper channels, disciplinary action may be taken against that employee.

6.0 Procedures

6.1 Who To Report Concerns To

- 6.1.1 All concerns should be reported internally in the first instance. Only when the internal procedures have been exhausted should concerns be raised externally.
- 6.1.2 The Company hopes all employees will raise any concerns first with their immediate supervisor or Head of Department.
- 6.1.3 If, for whatever reason, an employee is unable to raise his/her concern with his/her immediate supervisor or Head of Department, all matters or concerns shall then be raised directly to the Executive Chairman, who is the principal party acting as guardian to this Policy or the Company Secretary
- 6.1.4 If, for whatever reason, an employee is unable to raise his/her concern with the Executive Chairman, all matters or concerns may then be raised directly to the Chairman of Audit Committee who thereafter deal with the concern in accordance to this Policy.

6.2 How To Report Concerns

- 6.2.1 Employees may report their concerns in writing or face to face. Concerns are better raised in writing. The individual reporting the concern must make it clear that he/she is reporting the concern as part of this Policy.
- 6.2.2 Alternatively, employees may also report concerns via email –

internal.whistle@symphonylife.my

Emails sent to this address will be attended to discreetly as only the Executive Chairman will have access to this email to ensure the strictest of confidentiality.

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- 6.2.3 Whether the report is made in writing or face to face, whether anonymously or otherwise, employees who wish to make a report should furnish the following information:
- the background and history of the allegation;
 - the nature of malpractice that is alleged;
 - relevant dates where possible;
 - the reasons for the allegation; and
 - the names of employees whom the allegations are made.
- 6.2.4 Where the concern is reported face to face, the person receiving such report shall make a record of the details of the oral disclosure and confirm these **in writing** detailing information as set out in section 6.2.3 above.
- 6.2.5 On receipt of the report (whether in writing or orally) the person receiving the report will write to the Complainant:
- acknowledging that the concern has been received;
 - indicating how the Company propose to deal with the matter;
 - giving an estimate of how long it will take to provide a full response;
 - saying whether any initial enquiries have been made;
 - supplying information on support available to the Complainant; and
 - indicating whether further investigation will take place and if not, why not.
- 6.2.6 In circumstances where concerns are reported to the employee's immediate supervisor or Head of Department or the Company Secretary, the said person shall refer the matter to the Executive Chairman or the Chairman of Audit Committee as the case may be within **three (3) working days**.
- 6.2.7 All Managers have an absolute responsibility to act on the concerns reported. Failure to do so will be a disciplinary offence.

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6.3 How Reported Concerns Will Be Handled

- 6.3.1 Once a concern is reported, the Company will look into it carefully and thoroughly to assess what action, if any, should be taken. Depending on the nature of the concern, the Company may conduct an internal inquiry or a more formal investigation. The Company will inform the Complainant who will be investigating the concern, how the Complainant can contact him/her and whether the Company will need further assistance from the Complainant.
- 6.3.2 The Company may ask the Complainant how he/she think his/her concern should be best dealt with. If the Complainant has a personal interest in the matter the Company would ask that the Complainant tell us at the outset.
- 6.3.3 Whilst the Company will try to give the Complainant as much feedback as possible, the Company may not be able to provide specific details as this could infringe upon the privacy of another individual. The Company cannot guarantee that the Company will respond to all concerns in the way that the Complainant might wish, but the Company will try to handle the matter fairly and properly. By using this Policy, employees will help us to achieve this.
- 6.3.4 If there is evidence of criminal activity, then the Executive Chairman or the Chairman of the Audit Committee (as the case may be) and/or the appointed investigating officer should inform the police. The Company will ensure that any internal investigation does not hinder a formal police investigation.
- 6.3.5 If the concerns reported require a more formal investigation, the matter will be investigated thoroughly and in a timely manner by the Company and appropriate corrective action will be pursued.
- 6.3.6 A suitable person may be appointed to carry out any investigation, according to the nature of the issue. Only senior managers who have the required skills and experience will be appointed as investigating officers. If these skills are not readily available in the Company, external expertise will be sought.
- 6.3.7 Employees must not attempt to personally conduct investigations or interviews or question anyone unless asked to do so by the Executive Chairman or the Chairman of the Audit Committee (as the case may be).

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6.3.8 All employees must cooperate completely in any investigation arising from this Policy, and must be truthful at all times. Employees may never interfere with or obstruct an investigation conducted by the Company or any government agency. In addition, employees may never disclose or discuss an investigation with unauthorised persons.

6.4 Timescales

Due to the varied nature of these sorts of concerns, which may involve internal investigators and/or the police, it is not possible to lay down precise timescales for such investigations. The Executive Chairman or the Chairman of the Audit Committee (as the case may be) and/or the investigating officer shall ensure that the investigations are undertaken as quickly as possible without affecting the quality and depth of those investigations.

If the investigation is a prolonged one, the investigating officer should keep the Complainant informed, in writing, as to the progress of the investigation and as to when it is likely to be concluded.

6.5 What Happens After The Investigation

The Executive Chairman or the Chairman of the Audit Committee (as the case may be) will ensure that the findings of the investigation are communicated to:

- the Complainant;
- the individual(s) under investigation; and, if appropriate;
- the designated management of the Symphony Life Group; and
- the Audit Committee Members or other external authorities who may need to consider whether action should be taken on the basis of the findings.

The records will be destroyed after 7 years. Records will only be destroyed for matters which have been resolved.

6.6 Support After An Investigation

Where necessary the Company will provide support, counselling or mediation in order to ensure normal working relationships are resumed as effectively as possible.

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6.7 If You Are Dissatisfied

If the Complainant is not satisfied that their concern is being properly dealt with by the investigating officer, they have the right to raise it in confidence with the Chairman of Audit Committee.

6.8 Audit Committee

A summary of the findings of all investigations under this process will be reported to the Audit Committee. Audit Committee is:

- to advise Management and recommend on the appropriate course of action to be taken, how and with whom to raise concerns when they arise; and
- to provide support, if necessary, to employee at any stage of the process.

7. External Contacts

The Terms of Employment, Code of Conduct as well as other relevant handbooks require that employees do not disclose confidential, false or misleading information. In considering taking a concern outside the Group, employees should be aware of their duty of confidentiality and should consider whether reporting the concern externally, without first giving the Group the opportunity to look into the matter, is the reasonable course of action.

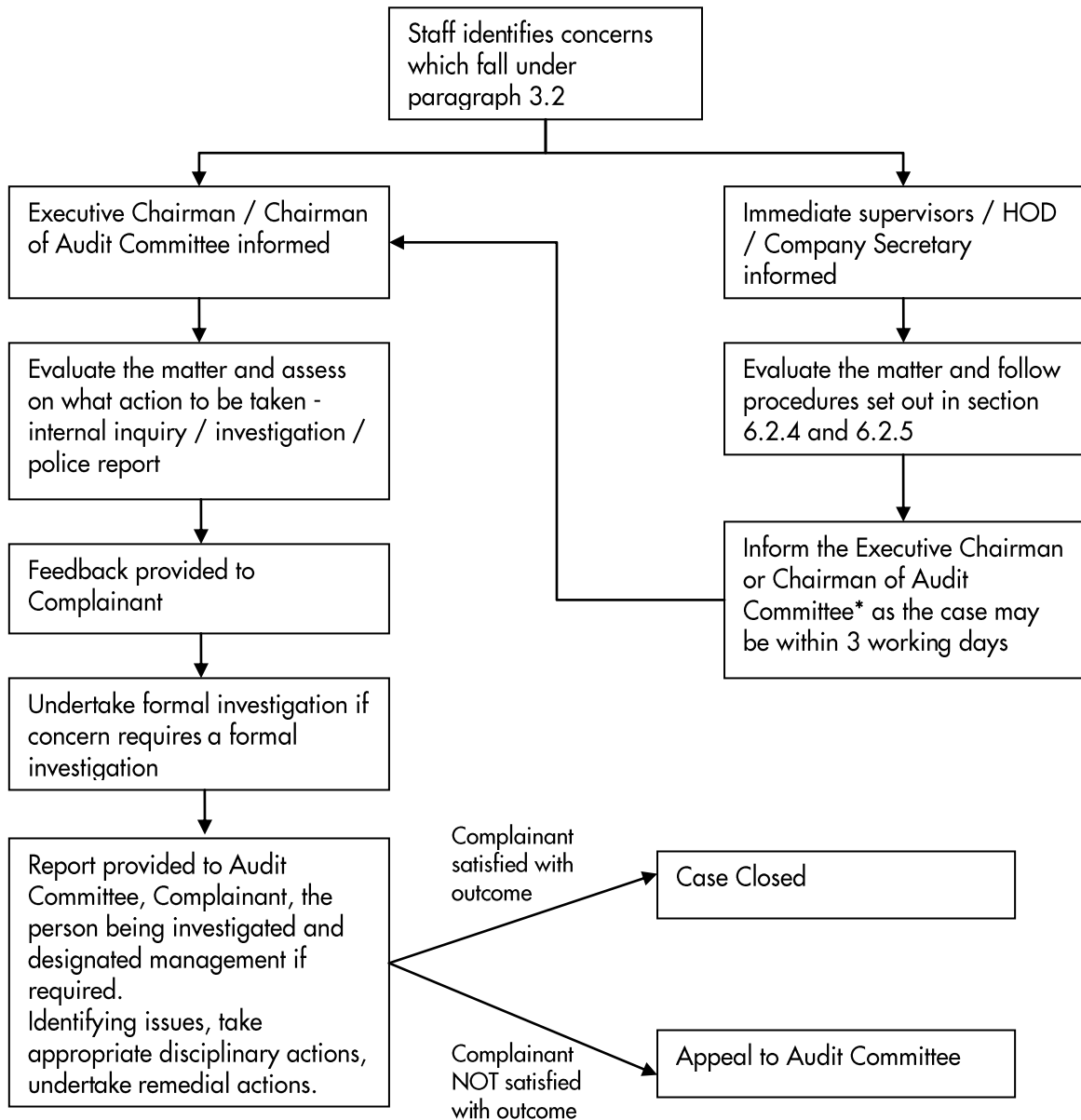
The Company hopes this Policy gives employee the reassurances needed to raise concerns internally. However, if the employee still feels uneasy disclosing his/her concerns internally, the Company would rather he/she report the concern with the appropriate regulator than not at all. Provided an employee is acting in good faith and has evidence to back up his/her concerns, and as provided by law, employees may report illegal or unethical practices directly to the statutory bodies such as Malaysian Anti-Corruption Commission, The Security Commission, The Police Force, or other similar government agencies.

8. Monitoring the Policy

Confidential records will be kept of all matters reported through this Policy and the Audit Committee and other appropriate committee will receive reports with an assessment of the effectiveness of the Policy. This Policy will be reviewed at least annually or after each use. Any need for change will be reported to the Audit Committee for approval.

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FLOWCHART OF PROCESS UNDER THIS POLICY



* The Chairman of Audit Committee shall be informed only if, for whatever reasons, the concern cannot be referred to the Executive Chairman