

Whistleblowing Policy and Procedure

In embracing good corporate governance practice, Sumitomo Mitsui Banking Corporation, Labuan Branch ("SMBCLBN") has put in place Whistle Blowing Policy and Procedure Manual to promote high standards of ethical conduct among its employees, service providers and vendors to set out channels and procedures for its stakeholders to raise concern, without fear of retaliation, on any wrongdoing that they may observe within SMBCLBN.

Who are the Whistle-blowers?

Whistle-blowers are any of the persons, listed below, who makes a whistle blowing report pursuant to SMBCLBN's Whistle Blowing Policy and Procedures:

- a) The Bank's directors, employees (including senior management, contract employees, employees during their trial or probation period, temporary-hired employees and part-time employees directly hired by the Bank) and officers of the Bank;
- b) Part time and temporary-hired employees, who are sent by outside service providers to work at offices of SMBCLBN, or employees of other companies seconded to offices of SMBCLBN;
- c) Employees of the service providers to which business operations have been outsourced, and employees of business agent;
- d) Relatives or spouses of the Bank employees;
- e) Employees who were in any position of (a), (b) and (c) within one year before the whistle blowing;
- f) The Bank's customers; and
- g) The public

Who can the whistle be blown over?

- i. Director and employee within SMBCLBN
- ii. Any party or person providing services to or having a business relationship with SMBCLBN.

Allegation that may be reported on, including but NOT limited to the following:

- a) Violation or suspected violation of laws or regulations;
- b) Causing damage to any of the following:
 - i. Interest or reputation of SMBCLBN
 - ii. Life, body, interest or reputation of a customer, director, officer or employee
 - iii. Orderly conduct of a market
- c) Violation or suspected violation of SMBCLBN guidelines or rules (including the Compliance Manual or other compliance policies of the Bank); or
- d) Improper business conduct

Reporting Channel and procedures

Whistle-blowers can raise their concern via any of the following methods:

1) Chief Compliance Officer (“CCO”)

Means	Methods
Telephone Number:	Call the Chief Compliance Officer at 03-2168 1233. After call promptly email the completed Whistle Blowing Form to lbw_whistle_blowing@my.smbc.co.jp
Email address:	Fill in the Whistle Blowing Form and email to Attention: Chief Compliance Officer lbw_whistle_blowing@my.smbc.co.jp
Mailing Address:	Fill up the Whistle Blowing Form and mail it to SMBCLBN Office: Attention: Chief Compliance Officer c/o Sumitomo Mitsui Banking Corporation Malaysia Berhad, Suite 22-03, Level 22, Integra Tower, The Intermark, 348, Jalan Tun Razak, 50400 Kuala Lumpur

For concern on sexual harassment, work conditions or environment, report can be raised to the Head of Human Resource Department (“HRD”) via the following methods:

2) Head of Human Resource Department (“HRD”)

Means	Methods
Telephone Number	Call the Head of Human Resource Department at 03-2176 1400 After call promptly email the completed Whistle Blowing Form to lbw_whistle_blowing@my.smbc.co.jp
Email	Fill in the Whistle Blowing Form and email to lbw_whistle_blowing@my.smbc.co.jp
Mailing Address	Fill up the Whistle Blowing Form and mail it to SMBCLBN Office: Attention: Head of Human Resource Department c/o Sumitomo Mitsui Banking Corporation Malaysia Berhad, Suite 22-03, Level 22, Integra Tower, The Intermark, 348, Jalan Tun Razak, 50400 Kuala Lumpur

Alternatively, the whistle-blowers can report to regulators or law enforcement agencies directly (e.g. Labuan Financial Services Authority (“LFSA”), and Malaysian Anti-Corruption Commission (“MACC”), under the Whistle-blower Protection Act 2010.

3) Labuan Financial Services Authority (“LFSA”)

Means	Methods
Telephone Number	03-8873 2000
Email	communication@labuanfsa.gov.my
Mailing Address	Corporate Communication & External Relations Unit Labuan Financial Services Authority Level 17, Main Office Tower Financial Park Complex Jalan Merdeka 87000 Labuan, Malaysia
Website	https://www.labuanfsa.gov.my/contact-us/enquiries-complaints

4) Malaysian Anti-Corruption Commission (“MACC”)

Means	Methods
Telephone Number	1800-88-6000 (Hotline) 03-8870 0000 / 03-8870 0688 (Telephone)
Email address	info@sprm.gov.my
Mailing Address	MACC Headquarters: No. 2 Lebu Wawasan, Presint 7, 62250 Putrajaya.
Website	www.sprm.gov.my (Malaysian Anti-Corruption Commission) www.portaladuan.sprm.gov.my (Online Complaint Management System)

The whistle-blower may remain anonymous. However, to facilitate investigations the whistle-blower is encouraged to disclose to the contact office the following information:

- His/her name;
- The name of the company and department he/she works for;
- His/her contact number; and
- His/her email address

Anyone opting to stay anonymous should be aware that SMBCLBN's investigation into the alleged improper conduct: -

1. will be limited to the details included in the report submitted.
2. if the Bank is not able to contact the Whistle-blower, the Bank may not be able to investigate any whistle-blowing report.

If you choose not to use the standardised whistleblowing form, please provide the following information to facilitate any investigation: -

- a) The name of the person the allegation is made against;
- b) The name of the department the person works in;
- c) His or her contact telephone number;
- d) His or her email address

Upon receipt of a report, the details of the allegation will be verified. Whistle-blower will be notified by email or mail by SMBCLBN on the receipt of the allegation and whether the allegation will be investigated. SMBCLBN may request the whistle-blower for additional information necessary for the verification of the allegations.

This process should not be used for improper purposes such as to make false allegations. A person who is found to have abuse the process will be subject to disciplinary proceedings or other action.

Protection Accorded to the Whistle-blower

Whistle-blower, who whistle-blow in accordance with the policy, shall be protected without any repercussions or treated unfairly in any way.

WHISTLE BLOWING FORM

Date:

1. Your Information:

Name	
Name of the company you work for (for non-SMBCLBN persons)	
Employee number	
Department you belong to or work for	
E-mail address	
Telephone number	

2. Allegations:

Classification:

1) Circle the applicable	(a) Sexual harassment-related (b) Work conditions or environment-related, other than (a) (c) Other than (a) and (b)
2) Circle the applicable	(a) Violation or suspected violation of laws or regulations (including legal standards of administrative bodies such as cabinet and ministerial ordinances) (applicable law/regulation: *) (b) causing damages to any of the following: • Interest, reliability or reputation of SMBCLBN • life, body, interest or reputation of a customer, director, officer or employee • orderly conduct of a market or financial system (c) Violation or suspected violation of SMBCLBN guidelines or rules (including the Compliance Manual or other compliance policies of the Bank) (applicable guidelines/rules: *) (d) Improper business conduct (State details:)
Department involved	
Director, officer or employee involved	
Specific details	

* This section may be left blank.