



WHISTLEBLOWING POLICY

(Version October 2022)

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1. PURPOSE

To provide an avenue for all employees of Hong Leong Bank Vietnam Limited (“HLBVN” or the “Bank”), and any (legal or natural) person including those providing services to, or having a business relationship with the Bank, to raise genuine concerns about any improper conduct or wrongful act (“Improper Conduct”) that is committed involving the Bank and/or our employees and business partners through the HLBVN’s whistleblowing channel on a confidential basis.

2. SCOPE

2.1 This Board Policy on Whistleblowing (“Whistleblowing Policy” or “this Policy”) applies to all employees of HLBN.



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- 2.2 The more stringent requirements between this Policy and the Hong Leong Bank Group (“HLBG”) Board Policy on Whistleblowing (“HLBG’s Whistleblowing Policy”) are to be adopted. In the event HLBG’s Whistleblowing Policy is more stringent and cannot be observed, the reasons for non-observation must be subject to acceptance by the HLBG’s Whistleblowing Policy Owner, and the variation to this Policy must be subject to approval by the HLBG’s Whistleblowing Policy Owner.
- 2.3 The following persons may raise any genuine concerns about any Improper Conduct vide HLBN’s whistleblowing channel:
- a) Any employee or director of HLBN; and
 - b) Any (legal or natural) person, including those providing services to, or having a business relationship with HLBN.

3. POLICY STATEMENT

A fundamental value of the Bank is that we are ‘Here for the Long Term’. In upholding this value, the Bank commits to a high standard of professionalism and ethics in the conduct of our business and professional activities as set out in the HLBVN’s Code of Conduct & Ethics (“Code”). All employees are encouraged to raise genuine concern about any actual or potential Improper Conduct that compromises these aspirations and consequently have the potential to tarnish the Bank’s reputation and community standing. Such genuine concerns should be raised at the earliest opportunity and in an appropriate way, through available channels provided under this Whistleblowing Policy or following the internal escalation process as provided under the HLBVN's Board Policy on Compliance.



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4. PRINCIPLES

- 4.1 You must speak up if you witness or if you are improperly instructed or advised to carry out illegal or unethical act, including wrongdoing by third parties (such as customers, vendors or business partners).
- 4.2 Whistleblower report will be treated with strict confidentiality and only shared where necessary, for example with persons who are involved in investigating, resolving, or remediating the issue.

- 4.3 Concerns that may be raised through whistleblowing should be the genuine concerns about any Improper Conduct involving HLBVN and/or that may adversely impact HLBVN, including but not limited to:
- a) Any integrity / honesty or criminal offences, including fraud, theft, criminal breach of trust, corruption, bribery and blackmail
 - b) Any failure to comply with legal or regulatory obligations
 - c) Violations of the Bank's Policies, Procedures and Standards
 - d) Any improper conduct which would be a disciplinary offence; or
 - e) Any gross mismanagement of company affairs
- 4.4 Please note that any grievance of a personal nature or that is related to your employment should be raised through Human Resources (HR) channel and not through this Whistleblowing Policy or the Whistleblower Form.

5. PROCEDURE

- 5.1 Any disclosure of Improper Conduct that concerns the Bank must be made to any of the relevant Designated Person through the communication channels listed below:

whistleblowing@hlbvn.hongleong.com

*Hong Leong Bank Vietnam Limited
1st Floor, Centec Tower,
72-74 Nguyen Thi Minh Khai, District 3, Hochiminh city, Vietnam*

- 5.2 Whistleblowers are advised to make their disclosures in writing and to provide sufficient details which include the following:
- a) the type or description of Improper conduct
 - b) the name of individuals who have committed or are involved in the Improper conduct
 - c) full details of the concern raised, including the ‘what’, ‘when’ and ‘where’ in relation to the Improper Conduct; and
 - d) the relevant supporting documents or evidence, if any.
- Should you wish to do so, you may use our [Whistleblower Form](#) to provide the details required
- 5.3 Whistleblowers are encouraged to provide their full name and contact details, to facilitate the Bank to clarify or obtain further information for purposes of further investigation into the Improper Conduct.
- 5.4 Any person who elect to remain anonymous is advised that the Bank’s ability to investigate the alleged Improper Conduct is limited to the extent of the contents of the report received by the Bank. Where insufficient information is provided, the Bank reserves the right not to investigate the alleged Improper Conduct that is raised anonymously, due to inability to seek clarification to ascertain relevant facts for investigation purposes.
- 5.5 Whistleblowers also have the right to report to relevant government or regulatory authorities and enforcement agencies in Vietnam as prescribed in the whistleblowing provisions of applicable laws and regulations, including but not limited to those relating to anti-bribery and corruption, labour, banking activities, etc.

6. WHISTLEBLOWER PROTECTION

- 6.1 Subject to paragraph 6.2 below and to the extent permitted by law, you will be protected from retaliation, adverse employment action or legal action and where feasible, from disclosure of your identity, provided your report is made in good faith (even if you are genuinely mistaken in the concerns you raise).

- 6.2 Your protection may be revoked and appropriate action may be taken against you if:
- a) you have participated in the Improper Conduct disclosed;
 - b) you made a material statement which you knew or believed to be false or did not believe to be true;
 - c) the disclosure of the Improper Conduct is frivolous or vexatious;
 - d) the disclosure of the Improper Conduct is made maliciously; or
 - e) the disclosure of the Improper Conduct is made solely or substantially with the motive of avoiding dismissal or other disciplinary action.

7. DISCLOSURE OF PERSONAL INFORMATION

Please note that the Bank may disclose your personal information to the Council of Members, investigation team and designated Compliance personnel, in order to follow up and, if appropriate, act on your complaint, or where required by law or regulatory authorities.

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8. INVOLVEMENT OF WHISTLEBLOWER IN THE INVESTIGATION

Whistleblowers may be requested to assist when more information is needed during the investigation of the alleged Improper Conduct.

9. REFERENCE

This Policy has been formulated to include HLBVN internal requirements with reference to the following regulatory guidelines:

- The Penal Code no.100/2015/QH13, dated 27 November 2015 and its amendment;
- Law on Anti-Corruption no.36/2018/QH14, dated 20 November 2018;
- Labor Code no. 45/2019/QH14, dated 20 November 2019.

WHISTLEBLOWER FORM

You should raise any genuine concerns about any improper conduct or wrongful act (“Improper Conduct”) involving Hong Leong Bank Vietnam Limited. Concerns on your personal position or your employment, should be raised through Human Resources (HR) channel, and not through this Whistleblower Form.

YOUR RELATIONSHIP WITH HONG LEONG BANK VIETNAM LIMITED	<p>Please tick all applicable:</p> <p>Customer: <input type="checkbox"/></p> <p>Employee: <input type="checkbox"/></p> <hr/> <p>OTHER: Please specify your relationship. Please include your employer’s details if your employer provides services to or otherwise has a business relationship with Hong Leong Bank Vietnam Limited.</p>
ACCOUNT TYPE(S) (For customers)	<p>Please tick all applicable types:</p> <p>Current account: <input type="checkbox"/> Savings account: <input type="checkbox"/></p> <p>Loan: <input type="checkbox"/> Mortgage: <input type="checkbox"/></p> <hr/> <p>OTHERS: Please specify Hong Leong products/services which are provided to you.</p>
YOUR STAFF ID: (If you are a Hong Leong Bank Vietnam Limited staff)	
YOUR CONTACT DETAILS	<p>Full name:</p> <p>Address:</p> <p>Telephone:</p> <p>Email:</p>

DETAILS OF YOUR CONCERNS:
(Please provide as much information as possible)

DESCRIPTION OF IMPROPER CONDUCT:
(use the additional information sheet, if necessary)

WHERE DID THE IMPROPER CONDUCT OCCUR?

WHEN DID THE IMPROPER CONDUCT OCCUR?

NAME AND POSITION OF PERSON(S) INVOLVED:

DETAILS OF ANY WITNESS(ES):

DID YOU REPORT THE IMPROPER CONDUCT TO ANY AUTHORITIES? IF YES, PLEASE GIVE DETAILS:

SUPPORTING DOCUMENT(S) ATTACHED (Please tick)? Yes No

ADDITIONAL INFORMATION SHEET**ANY ADDITIONAL INFORMATION:**

Provide any further details you think may be relevant, for example, whether you approached the person(s) concerned, any financial impact to the Hong Leong Bank Vietnam Limited, etc.