



ANTI-BRIBERY & CORRUPTION POLICY (ABC)

INTRODUCTION

1. Integrity is our core value and the guiding principle of our decisions and actions in the workplace. SLIC Group are committed to doing our business in a fair, open, honest and transparent manner. SLIC Group practices high ethical standards in everything that we do.
2. Bribery and corruption compromises business ethics and damages an organization's reputation. As such, SLIC Group strongly opposes any practice that improperly or illegally disrupts proper business conduct.
3. This Anti-Bribery and Corruption Policy ("ABC Policy") provides a clear statement of the conduct which is expected of SLIC Group's personnel. This policy also applies to any third party who performs services for and on behalf of SLIC Group.

OBJECTIVE

1. The Board of Directors of SLIC Group is committed to complying with the anti-bribery and corruption laws in Malaysia. Thus, this ABC Policy has been developed with the purpose of fulfilling the said legal and regulatory requirements and sets out SLIC Group's overall position on bribery and corruption in all forms, such as dealing with third parties, managing conflicts of interest, gifts, hospitality, and whistleblowing.
2. Ultimately, the objective of this ABC Policy is to provide guidance for our personnel and business associates and assist them to identify and deal with bribery and corruption issues, as well as understanding their roles and responsibilities.

SCOPE

This ABC Policy applies to:

- (a) Directors (both executive and non-executive), officers, employees of SLIC Group (including permanent, part-time and contract (fixed-term) employees), and volunteers ("Personnel")
- (b) Any third party (person or entity) who performs services for or on behalf of SLIC Group. This includes actual and potential clients, customers, joint-ventures, joint-venture partners, consortium partners, outsourcing providers, contractors, consultants, sub-contractors, suppliers, vendors, agents, distributors, representatives, intermediaries and investors ("Business Associates"); and
- (c) Joint-venture entities in which SLIC Group has non-controlling interests, co-ventures and associated companies are strongly encouraged to adopt these or similar principles.

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1. Bribery and Implications

- 1.1. Managers and supervisors of all levels have additional responsibilities under the ABC Policy and are held to a higher standard of compliance. They are required to create and maintain an open environment that is comfortable for employees to ask questions, raise concerns and report misconduct.
- 1.3. All employees of the SLIC Group must refrain from any acts of bribery which takes the form of offering, promising, giving, demanding or receiving anything of value to anyone in the form of bribes, kickbacks and/or any other improper gratification (including gifts, hospitality and entertainment) to improperly influence the outcome of any transaction, whether it is for their own personal benefit or for the benefit of the SLIC Group.
- 1.4. The SLIC Group strictly does not tolerate any bribes given for purposes of obtaining or retaining business for the SLIC Group or provides an advantage to the businesses of the SLIC Group. The SLIC Group does not tolerate any such acts of bribery even in a personal capacity.
- 1.5. Any employee of the SLIC Group that breaches any of the ABC Policy may fall within the scope of serious misconduct and may be subjected to disciplinary action, up to and including dismissal, depending on the facts and circumstances of each case.

2. Definitions

- 2.1. "Gratification" shall have the meaning defined in the Malaysian Anti-Corruption Commission Act 2009 which includes but is not limited to anything of monetary and non-monetary value or benefit to the person. Gratification does not have to be directly given or received by an employee, but it can also be given or received by anyone related to the employee that is beneficial, of value or advantageous to the employee.
- 2.2. Gratification can be subdivided into the following categories (without limitation to):-

A) MONETARY

- Money
- Donation
- Gift
- Loan
- Fee
- Reward
- Financial benefit
- Valuable security

B) OF MONETARY VALUE

- Property – can be movable or immovable.

Examples:

- Immovable property: house, land
- Movable property: car, shares in a company

C) EMPLOYMENT

- Office or position in an organisation that is lucrative.
- Dignity or title.
- Employment
- Contract for services
- Agreement to give employment or render services

D) NON-MONETARY VALUE

- Undertaking or promise to do or not to do something (whether orally or in writing, with conditions or without)
- Favours

2.3. "Gifts" can be in the form of goods or services, including anything that can be of value to the person receiving it. Examples of these can be free travel trips, tickets for any cultural, entertainment or sporting events, and payment of loan, school fees or medical expenses.

2.4. "Hospitality" includes providing meals, refreshment, travel, transportation, lodging, as well as entertainment in the context of conventional, cultural and sporting events.

2.5. "Public officials" are defined as any person who is a member, an officer, an employee or a servant of a public body.

2.6. Policies pertaining to these definitions will be further discussed in their respective clauses below.

3. Public Officials & Government Dealings

3.1. The SLIC Group recognises that the practice of giving and receiving gifts varies between countries, regions, cultures, and religions, so the definitions of what is acceptable and not acceptable will inevitably differ for each. When dealing with public officials, employees of the SLIC Group should ensure that any giving or receiving of gifts do not relate to, in any form whatsoever, the public official's official dealings or public duty. At all material times, employees of the SLIC Group are to ensure compliance with laws of their respective jurisdictions, and the higher standard will be applicable to all employees to avoid non-compliance of any laws on anti-bribery which may be applicable to the SLIC Group as a whole.

3.2. Any hospitality of public officials, subject to the approval of a director, are for circumstances where it is to reasonably facilitate genuine promotional, business or educational meetings. Any hospitality provided must be without expectation of any influence exerted on the public official in exchange for any commercial outcome, and should always be at a reasonable and modest value.

4. Gifts, Hospitality and Entertainment

4.1. In respect of any gifts, hospitality and entertainment in the commercial context:-

- (a) The intention behind giving or receiving any gifts, hospitality or entertainment must always be considered first. It should never be for an improper motive to obtain or retain a business, or to obtain some form of benefit or advantage, whether it is for the business or for the individual employee;
 - (b) If an employee is unsure of how to consider the intention behind any gifts, hospitality or entertainment offered, the employee must always disclose and refer the matter to the immediate supervisor or head of department to obtain advice and also approval before proceeding;
 - (c) All employees of the SLIC Group are not allowed to give or receive any gratification, gifts, hospitality or entertainment where it is for an improper purpose and can be deemed as a gratification, regardless of whether it is to benefit the employee individually or to benefit the business of any of the SLIC Group;
 - (d) An employee must obtain prior clearance and approval from the immediate supervisor and/or head of department before giving or receiving any gifts, hospitality or entertainment to or from any person which is not of any improper motive;
 - (e) Where any gifts, hospitality or entertainment is not improper and received before prior approval can be obtained, an employee must always disclose such gifts to the immediate supervisor and/or head of department, regardless of its value;
 - (f) Where it is difficult or inappropriate to decline the offer of a gift, hospitality or entertainment (i.e. when meeting with an individual of a certain religion/culture who may take offence), it may be accepted but it must be declared and/or surrendered to the employee's immediate supervisor and/or head of department, who will assess the relevant circumstances and take the necessary steps, including returning the gift on the employee's behalf, where appropriate or required to do so.
- 4.2. Any gifts, hospitality or entertainment provided by the SLIC Group must always be of moderate and reasonable value and should never be given:-
- (a) With an intention to exert improper influence or create a perception of expectation for certain outcomes beneficial to the business of SLIC Group;
or
 - (b) Where it causes a conflict of interest.
- 4.3. All employees of the SLIC Group should not give any gratification, gifts, hospitality or entertainment to persons for improper purposes related with SLIC Group's business in their personal capacity.

5. Facilitation Payments

- 5.1. Facilitation payments (also known as grease payments) are payments made for certain government services or to accelerate certain government processes that is otherwise legally entitled by the person without making any payments. Employees should ensure that these facilitation payments are not paid.

6. Donations, Sponsorships & Charitable Contributions
 - 6.1. Any donations, sponsorships and charitable contributions by the SLIC Group must be done with the approval of the executive director(s) and it must be done in a transparent manner for social and moral responsibility.
 - 6.2. It should never be paid in exchange for any business implications to the SLIC Group, whether it is to obtain a business, or to obtain some form of advantage of the business of the SLIC Group.
 - 6.3. Employees are encouraged to make donations and charitable contributions in their personal capacity, but it should never be in exchange for any improper purposes that affects the business of the SLIC Group.
 - 6.4. All employees of the SLIC Group should not agree or promise to provide any form of political donation or support particularly where it is to obtain any business or advantage to the SLIC Group. Any requests for political donations should be brought to the attention of the executive director(s) immediately.

7. Tender Process
 - 7.1. Any tender processes participated by any company under the SLIC Group should be done in a transparent manner in the bidding process.

8. Record Keeping & Training
 - 8.1. All employees of the SLIC Group are required to complete and undertake all relevant documentations and processes particularly where it relates to anti-bribery and corruption initiatives.
 - 8.2. Any failure to do so will impact the individual employee's performance review and, where it is a severe non-compliance, an employee may be subject to further disciplinary action/s. Where the facts and circumstances require, repeated failure to undertake proper record keeping or undergoing compulsory trainings may warrant the dismissal of an employee from the SLIC Group.

9. Compliance with the Law
 - 9.1. All employees of the SLIC Group and its affiliates are responsible in ensuring that they always comply with all laws and regulations, in particular, to the Malaysian Anti-Corruption Commission Act 2009. No excuses or exceptions will be acceptable for non-compliance of any domiciled laws and regulations where the SLIC Group conducts its businesses.

10. Third Parties & Agencies
 - 10.1. The SLIC Group requires that all employees conduct the requisite due diligence of third parties that the SLIC Group contracts with or hires to carry out any external

functions on behalf of the SLIC Group, which includes without limitation to agents, consultants, contractors, subcontractors, resellers, customs brokers, business contacts, professional advisors, joint venture partners and any other parties supplying goods and services to the SLIC Group (collectively referred to as "Other Applicable Person(s)")

- 10.2. Where reimbursements are paid to Other Applicable Persons, employees of the SLIC Group are to ensure that such payments made are for proper reimbursements and not for reimbursements that can be tied to giving any form of gratification for improper purposes.
- 10.3. The SLIC Group expects all Other Applicable Persons to have anti-bribery and corruption policies in place within their organisation or part of their work ethos which are consistent with this ABC Policy.
- 10.4. The SLIC Group has zero tolerance of Other Applicable Persons who do not conduct themselves in accordance to the principles of the ABC Policy where it brings disrepute or legal implications to the SLIC Group. Any non-compliance with the principles of the ABC Policy by Other Applicable Persons may lead to the review and/or termination of any agreement with such parties.

11. Violation of The ABC Policy

- 11.1. Any violation of the ABC Policy by employees of the SLIC Group will attract serious repercussions and disciplinary action after due inquiry. Where there is strong evidence of bribery and corruption committed by any employee of the SLIC Group, the employee can be summarily dismissed and will not be allowed to be employed in any other companies of the SLIC Group.
- 11.2. Employees who are found to have assisted or facilitated the violation of the ABC Policy, whether actively or by way of negligence or omission, will also be deemed to have violated the ABC Policy and committed a misconduct that is liable for dismissal from their employment with the SLIC Group.

12. Reporting for Violations of Policy & Whistleblower Rights

- 12.1. Where there are reasonable grounds and genuine reasons to suspect that there is a violation of the ABC policy, employees of the SLIC Group and Other Applicable Persons are required to report the particulars of such suspicions to the SLIC Group's dedicated channel for reporting. Any such reports will be read and addressed by a dedicated compliance team in the SLIC Group.
- 12.2. Any concerns, questions or reports should be addressed to firstly, their immediate supervisor or Head of Department, or where that is not possible, to other functions such as the Human Resource Department, Legal, and Internal Audit.
- 12.3. Any reports made for violation of the ABC Policy will be treated very seriously and accordingly, employees are responsible to ensure that:-
 - (a) They exercise sound judgment that it is a genuine threat and violation of the ABC Policy;

- (b) They have evidence to support their allegations of any violations of the ABC Policy;
 - (c) They are available to provide evidence in any inquiry of such violations; and
 - (d) They are not frivolous reports with the motive to scandalise.
- 12.4. The SLIC Group ensures that there will be no retaliation or repercussions on the employee for making genuine reports on violation of the ABC Policy. Any genuine reports made will be kept strictly confidential and only informed to persons on a need-to-know basis to safeguard the interests of the SLIC Group and also to ensure that any processes undertaken will not be compromised.

13. Compliance and Review of the Policy

- 13.1. The SLIC Group and its Board of Directors will be monitoring compliance with the ABC Policy. There is no tolerance or excuse for non-compliance with the ABC Policy.
- 13.2. Where there is any uncertainty for any practices which relate to the ABC Policy, employees must always seek the advice of their supervisor or head of department. Where there is still uncertainty, they should direct their concerns to Human Resource Department, Legal, or Internal Audit.
- 13.3. The ABC Policy will be reviewed from time-to-time, and at least once every three years to ensure that it continues to remain relevant, appropriate and effective in the enforcement of the principles herein and to ensure continued compliance with the prevailing law.
- 13.4. All employees of the SLIC Group are responsible to complete all training modules of the ABC Policy and keep themselves up-to-date with the SLIC Group and their employer's latest policies and processes, in particular, this ABC Policy and ensure that the highest standards of compliance are followed.



WHISTLE BLOWING POLICY

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1. Policy statement

At SLIC, we expect our employees to conduct themselves with a high standard of professionalism and ethics in the conduct of our business and professional activities.

As part of good corporate governance, SLIC have establish a whistle blowing policy that sets out avenues for legitimate concerns to be objectively investigated and addressed. Individuals will be able to raise concerns about illegal, unethical or questionable practices in confidence and without the risk of reprisal.

The implementation of the policy is also in line with the Whistleblower Protection Act 2010, Companies Act 2016, Malaysian Anti-Corruption Commission Act 2009, Capital Market and Services Act 2015, Personal Data Protection Act 2010 and all applicable laws and regulations in Malaysia.

2. Definitions

Whistleblowing is the voluntary disclosure of inappropriate, unethical or unlawful behaviour and practices by the management or employees. It includes how employees, customers and investors are treated. The following are generally accepted as improper and reportable conduct for whistleblowing, of which the list is not exhaustive:

Any unlawful or illegal activities, whether criminal or breach in civil law;

- Breach of policies and/or procedures;
- Fraud, theft, embezzlement or dishonesty;
- Corruption/bribery;
- Bullying and harassment;
- Actions which can cause physical danger/harm to another person and/or can give rise to risk of damage to properties/assets;
- Forgery or alteration of any documents belonging to the Company, customers, another Financial Institution, or agents of the Company;
- Poor or unethical sales practices, including mis-selling;
- Profiteering as a result of insider knowledge;
- Gross mismanagement or dereliction of duties;
- Conflict of interest;
- Misuse of position or information; and
- Any other similar or related irregularities.

3. Eligibility

Anyone has the right to whistle blow. This Policy applies to all matters involving the SLIC's employees (including former employees and irrespective of nature of employment status), customers and any other stakeholders/persons providing services to the Group, including consultants, vendors, independent contractors, external agencies and/or any other party with a business relationship with SLIC.

4. Disclosure procedures

We take whistle blowing seriously and your concern matters to us, so we would like to hear from you if any of your disclosure is related to improper practices occurring within SLIC. Any disclosure can be made to any of the following dedicated reporting channels:

Email to whistleblowing@slc.com.my;

To facilitate an investigation into the alleged wrongdoing, where possible and applicable, the following information should be included when making a disclosure:

- a) Brief description of the misconduct;
- b) The date and location of the incidence;
- c) The identity of the wrongdoer;
- d) Particulars of witnesses, if any;
- e) Supporting evidence and/or documents;
- f) Other details deemed to be useful to facilitate screening and action to be carried out.

Where possible, the whistleblower is encouraged to disclose his/her personal details to enable the relevant parties conducting the investigation to contact the Whistleblower for further information:

- a) Name; and
- b) Contact details - email address and/or telephone number.

5. Processing, Investigating, Determining a Complaint or Report

After receiving the report of any alleged wrongdoing, it will be investigated by our Group Corporate Assurance Division and reporting to an Independent Board of Director.

If the outcome results in a proven case of wrongdoing/malpractice and confirms the allegations, disciplinary action shall be instituted against the related employees in accordance with the company's policy.

6. Whistleblower Protection

SLIC commits to ensure that all disclosed information, including the identity of the whistleblower shall be treated with strict confidentiality. All personnel, directly or indirectly working relative to a whistleblowing case, shall strictly protect the identity of the whistleblower and witnesses from unauthorized disclosure before, during and after an investigation.

SLIC is also committed to protect the whistleblower from all acts of harassment, retaliation, victimization and recrimination arising from making the disclosure in good faith.

There may be certain circumstances where the identity of the whistleblower may need to be revealed on a need to know basis (e.g. requirement to testify in court). If such a

situation arises, the Group shall discuss and seek consent with the whistleblower first before proceeding with the case.

The protection will be removed if it is found that the whistleblower was also involved in the improper conduct, or if the whistleblower is found to have made the disclosures in bad faith.

7. Responsibility of Whistleblower

- (a) Whistleblower makes the disclosure in good faith.
- (b) Whistleblower reasonably believes that the information and allegations are substantially true.
- (c) Whistleblower is not acting for personal gain. If the case involves the complainant's personal interests, it must be informed at the outset.



CODE OF CONDUCT AND ETHICS POLICY

This Code of Conduct & Ethics sets out the acceptable practices and ethics that guide the employees of the SLIC Group of Companies (“**SLIC Group**”).

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1. Accountability
 - 1.1 All employees of the SLIC Group are responsible for acting in accordance to the Core Values, policies and Code of Conduct of the SLIC Group (“**Code**”) and ensure compliance with the relevant laws, rules and regulations of the respective countries that the SLIC Group conducts its business in.
 - 1.2 Any employee who violates the Code may be subjected to disciplinary action, including dismissal, depending on the facts and circumstances of each case.
 - 1.3 All employees of the SLIC Group are obliged to exercise all reasonable care in safeguarding the SLIC Group’s properties and assets against any loss, damage, misuse, illegal use and/or theft and are expected to use such resources for the SLIC Group’s business purposes.

2. Responsibility
 - 2.1 The SLIC Group conducts its businesses ethically, honestly, and in compliance with the laws and regulations of the respective countries that it conducts its businesses in.
 - 2.2 All SLIC Group activities including the sourcing, distribution, sale and services, must be conducted with respect and in consideration of issues relating to legal rights, health and safety, and the environment.

3. Non-Discrimination
 - 3.1 The SLIC Group maintains a policy of non-discrimination and greatly values and respects the diversity, cultural and religious differences of its employees.
 - 3.2 Every employee is expected to cooperate and support the SLIC Group’s vision of cultivating and maintaining a work environment that is free from discrimination.
 - 3.3 During the hiring process, candidates will also be evaluated based on their willingness to adhere to the vision, values and overall corporate culture of the SLIC Group.

4. Communications
 - 4.1 All employees of the SLIC Group are expected to exercise due care, diligence and etiquette in all work-related communications, be it in written form, verbal or otherwise, and to ensure that the contents are clear, truthful, courteous and accurate.
 - 4.2 The SLIC Group exercises a no tolerance policy for any communications made by its employees over the course of business and/or using SLIC Group’s resources that contain any material found to be discriminatory, defamatory, offensive, contains sexual connotations, pornographic, misleading and/or any other communications of a similar nature.

5. Conflicts of Interest

- 5.1 All employees of the SLIC Group are obliged to act solely in the best interests of the Group at all times.
 - 5.2 No employee is permitted to engage, either directly or indirectly, in any act or practice that conflicts with, or appears to conflict with, the interests of the SLIC Group, even in their own time. This includes using any of the SLIC Group's assets or resources for personal interests and gain.
 - 5.3 A conflict of interest may arise where the employee has a personal relationship or financial or other interest that would or could potentially interfere with his existing obligations or exercise of judgment in decision making as an employee of the SLIC Group. It is also a conflict of interests where a supervisor or a person in a position to determine the remuneration and/or promotion of a subordinate is in a personal, romantic or intimate relationship with the subordinate.
 - 5.4 All employees of the SLIC Group are obliged to disclose and report in writing as soon as practically possible concerning all potential and real conflicts of interest, stating in detail the facts, nature and extent of the conflict. This written report should be made either to the employee's immediate supervisor(s) and/or executive director(s).
 - 5.5 The employee must take prompt action in eliminating the said conflict if requested to do so by the SLIC Group. The SLIC Group has the sole discretion in determining the nature of conflict of interests and the next steps or disciplinary action to be taken in relation to it.
 - 5.6 Where it is found that the employee is engaged in any activity that is in conflict of interests with the SLIC Group which provides personal and monetary gain, whether directly or indirectly, particularly where it is at the expense and loss of the SLIC Group, the SLIC Group is entitled to claim compensation for such unlawful profiteering from the conflict of interest, which may include deduction of the employee's salary until such payments are repaid in full or legal action against the employee.
6. Business Ethics
- 6.1 We are determined to maintain a work environment where trust is of paramount importance.
 - 6.2 All SLIC Group companies, and/or their employees shall refrain from offering, giving, demanding or receiving bribes and/or any other improper gratification.
 - 6.3 "Gratification" shall include but not be limited to pecuniary and non-pecuniary benefits such as money, donation, gift, loan, fee, reward, valuable security, property or interest in property, movable or immovable property, financial benefit, office, dignity, employment, contract of employment or services, agreement to give employment or render services in any capacity, any offer, undertaking or promise, whether conditional or unconditional, of any gratification, including favours which is of value to the recipient, forbearance which is beneficial to the recipient, and any other gratification as defined in the Malaysian Anti-Corruption Commission Act 2009.

- 6.4 Any gratifications to be given, if at all and only under circumstances which are approved by the employee's head of department or Human Resource Department, should only be a token gift either for purposes of expressing appreciation or for customary and festive purposes. Such gifts should not at any material time, be given with the intention of obtaining any favour or hopes of retaining business or undue influence for obtaining future business from the recipient of the gifts.
- 6.5 "Public officials" are defined as any person who is a member, an officer, an employee or a servant of a public body.
- 6.6 When dealing with public officials, employees of the SLIC Group should ensure that any giving or receiving of gratification does not relate to, in any form whatsoever, the public official's official dealings or public duty. The SLIC Group recognises that the practice of giving and receiving gratification varies between countries, regions, cultures, and religions, so the definitions of what is acceptable and not acceptable will inevitably differ for each. At all material times, employees are to ensure compliance with laws of their respective jurisdictions, and the higher standard will be applicable to all employees to avoid non-compliance of any laws on anti-bribery which may be applicable to the SLIC Group as a whole.
- 6.7 Where it is inappropriate to decline the offer of a gratification (i.e. when meeting with an individual of a certain religion/culture who may take offence), the gratification may be accepted so long as it is declared and surrendered to the employee's immediate supervisor and/or head of department, who will assess the relevant circumstances and take the necessary steps, including returning the gratification on the employee's behalf, where appropriate.
- 6.8 Any gratifications given and received should always be disclosed to the employee's immediate supervisor and/or head of department, and the employee must ensure that all requisite approvals have been obtained.
- 6.9 The intention behind a gratification being given and/or received should always be considered. If there is any uncertainty, the gratification should be declined where possible, failing which the employee should seek the advice of the employee's immediate supervisor and/or head of department.
- 6.10 Other than as permitted above, no employee of the SLIC Group is allowed to accept any gratification, including but not limited to gifts, hospitality favours, benefits or any form of advantage from third parties, unless specific approval has been given by the employee's head of department or Human Resource Department.
- 6.11 Any employee that breaches any of the above rules will fall within the scope of serious misconduct and may be subjected to disciplinary action, up to and including dismissal, depending on the facts and circumstances of each case.

7. Outside Employment

- 7.1 Employees are hired on the premise that SLIC is their primary employer and that any other employment or commercial involvement, even outside of working hours is strictly prohibited particularly where it conflicts with the interests of the SLIC Group, unless express approval is obtained.

- 7.2 Employees and managers are required to obtain written approvals from their head of department or Human Resources Department before participating in outside work activities. If you are already engaged in any outside employment, you are required to disclose and obtain approval from the Human Resource Department. Any approval given is at the sole discretion of the SLIC Group and can be withdrawn at any time with or without prior notice, and the employee is required to immediately cease such outside employment, failing which the SLIC Group is entitled to claim compensation for any unlawful profiteering as a result of any conflict of interest.
8. Insider Trading
- 8.1 Employees who are in possession of market sensitive information are not allowed to trade in securities of the Company if that information has not been made public. Employees are also prohibited from disclosing any non-public price sensitive information to any third party.
9. Anti-Money Laundering
- 9.1 “Money laundering” concerns the process of engaging with and/or concealing, directly or indirectly, the identity of the proceeds of illegal activities or converting the illegal proceeds to a legitimate source of income or asset.
- 9.2 All employees of the SLIC Group are prohibited from dealing in any money laundering activities and must comply with the applicable anti-money laundering laws.
- 9.3 In the event that any employee has a reasonable suspicion of money laundering activities being conducted as part of the SLIC Group’s business, employees are expected to alert their immediate manager or supervision to the same.
10. Distribution and Solicitation
- 10.1 Employees cannot distribute non-SLIC Group related materials during their working hours and on the SLIC Group’s premises.
- 10.2 The acts of solicitation and/or distribution of any materials relating to the sale of any goods or services unrelated to the SLIC Group’s business is strictly prohibited anywhere on the Group’s premises.
11. Personal Data Protection
- 11.1 The SLIC Group respects and is committed to the protection of employee’s personal information and privacy. The SLIC Group collects and handles employee information in accordance with the Malaysian Personal Data Protection Act 2010.
- 11.2 All employees, particularly employees who have access to personal data of any persons, whether employees, consultants, customers, suppliers, and/or any related party whereby personal data is processed and accessed, must not

unlawfully use, access and/or revise such personal data for any purpose or reason. All employees are to ensure that such personal data processed within the SLIC Group is protected at all material times and in compliance with the applicable laws.

12. Confidential and Proprietary Information

- 12.1 The SLIC Group greatly values and protects all confidential and proprietary information.
- 12.2 Proprietary information includes but is not limited to emails, documents and all other files, electronic or otherwise, edited and/or stored on the SLIC Group equipment and are considered to be the exclusive property of the SLIC Group.
- 12.3 All employees of the SLIC Group are expected to exercise the highest possible standards of professionalism, ethics and integrity in order to protect the Group's assets and standing and ensure the proper use of the same.
- 12.4 Employees may have access to confidential and proprietary information during their employment with the SLIC Group. Such information cannot be shared or utilised for personal gain or any other gain to any individual, business or third party entity, including family and friends, except where expressly approved by the relevant company under the SLIC Group, required by law and/or reasonably necessary for the purposes of carrying out your duties under employment within the SLIC Group. This obligation of non-disclosure is effective even after the termination of employment.
- 12.5 Where such confidential and proprietary information needs to be disclosed to persons outside the SLIC Group, the relevant parties are recommended to undertake all necessary measures to ensure that all confidential and/or proprietary information are sufficiently protected for instance through the execution of a non-disclosure agreement.
- 12.6 The SLIC Group reserves its right to take any and all appropriate action against previous or current employees who, whether directly or indirectly, breach the aforesaid obligation relating to the confidential and proprietary information of the SLIC Group.
- 12.7 In the event that you are unsure of what is permissible or non-permissible, you are advised to seek guidance from your head of department or the Human Resource Department.

13. Social Media Policy

- 13.1 Employees of the SLIC Group are a representative of the SLIC Group at all times and are prohibited from bringing the SLIC Group's (and each of the companies under the SLIC Group) name and reputation into disrepute.
- 13.2 All employees of the SLIC Group are reminded that any messages or posts made online are presumed to be public and permanent. Online messages or posts can be copied, forwarded or subpoenaed and the original publisher will have no control over the ultimate use, distribution and/or publication of the message or post. As

such, all employees are strongly encouraged to exercise discretion at all times when using and publishing on online platforms.

14. Press Release and Public Statements

- 14.1 All queries and/or requests made by members of the third party media outlets are to be directed to the Group Corporate office of SL Innovation Capital Berhad to ensure that a consistent and professional approach is adopted when addressing all external media queries.
- 14.2 No employee of the SLIC Group is permitted to make any public releases or public statements on behalf of the SLIC Group, or any of the companies within the SLIC Group, whether orally, in writing or otherwise, without having obtained prior written approval from the Group Corporate office of SL Innovation Capital Berhad.

15. Whistleblowing

- 15.1 The Company encourages employees to raise genuine concerns, including the reporting of unlawful, unethical or questionable behaviour, in confidence and without risk of reprisal.
- 15.2 The policy covers, but is not limited to:
 - a. Breach of policies and/or procedures;
 - b. Fraud, theft, embezzlement or dishonesty;
 - c. Corruption/bribery;
 - d. Bullying and harassment;
 - a. Actions which can cause physical danger/harm to another person and/or can give rise to risk of damage to properties/assets;
 - e. Forgery or alteration of any documents belonging to the Company, customers, another Financial Institution, or agents of the Company;
 - f. Poor or unethical sales practices, including mis-selling;
 - g. Profiteering as a result of insider knowledge;
 - h. Gross mismanagement or dereliction of duties;
 - i. Conflict of interest;
 - j. Misuse of position or information; and
 - k. Any other similar or related irregularities.
- 15.3 If any employee has concerns about any of the matters set out above or that the integrity of the SLIC Group is being compromised in any other way, the employee should bring this to the attention of his immediate supervisor, head of department or a Human Resource Manager.
- 15.4 Employees must exercise sound judgment to avoid baseless allegations.
- 15.5 Employees who intentionally file false reports will be subjected to disciplinary action and possible termination.