

# Tangerine Life

---

## WHISTLE BLOWING POLICY

## Contents

1. Introduction.....	2
2. Purpose.....	3
3. Open Culture.....	4
4. Related Documents.....	4
5. Scope.....	4
6. Confidentiality.....	5
7.Reporting.....	6
7.1 Whistleblowing Channels.....	6
7.2 Minimum Information Required for a Whistleblowing Report.....	6
8. Confidential & Anonymous Whistleblowing.....	6
9. Whistleblower Protection.....	7
10. False Allegations & Complicity.....	7
11. Investigation and Follow-up.....	7
12. How to Raise Concerns.....	8
13. Escalation.....	8
14. Assurance.....	8
Declaration.....	9

### 1. Introduction

- 1.1 Tangerine Life ("the Company") is committed to ethical and fair business conduct and does not tolerate any form of dishonesty, fraud, theft, corruption, malpractices or unethical behaviour in its operations. The Company requires Staff and all Parties that have business relationship with it to, at all times, act honestly and with integrity and to safeguard the Company's resources (tangible and intangible) for which they are responsible.
- 1.2 Tangerine Life has a **zero tolerance** to the commission or concealment of fraudulent, illegal and unethical acts, including infraction of its business principles as well as other ethics related policies of the Company.
- 1.3 Therefore, all employees, consisting of permanent staff, contract staff, unconfirmed staff, agents, interns and Youth Corp Members, acting for and on behalf of the Company, are required to, without fear of reprisal, disclose actual, potential or suspected instances of malpractice to an internal source, as provided for within this whistleblowing policy ("the Policy").
- 1.4 This disclosure requirement also extends to the Company's business associates and other external Stakeholders, such as Contractors, Consultants, Suppliers, Shareholders, Clients, Regulators, amongst others.

## 2. Purpose

- 2.1 Whistleblowing is the act of disclosing or raising concerns about misconduct or other actions affecting the Company, or occurring within the Company, and which could endanger the Company and its employees or threaten its Client's, Shareholders or the public.
- 2.2 The act of whistleblowing is an invaluable source of early warning, which alerts the Company to incidents that could be of negative consequences. It therefore serves as a useful tool in the identification and management of risk.
- 2.3 The purpose of the Whistleblowing Policy is to ensure strict compliance with Tangerine Life's zero tolerance to fraudulent, illegal and unethical acts, thereby protecting the Company's interest as well as that of its Clients and Shareholders.
- 2.4 Accordingly, the Whistleblowing Policy is intended to encourage and facilitate the disclosure of any form of misconduct to an internal authorised officer, via an approved means.
- 2.5 This Policy aims to:
  - a. Encourage employees to feel confident in raising serious concerns, and to question or act upon concerns about malpractices;
  - b. Provide avenues for employees to raise those concerns and receive feedback on any action taken;
  - c. Ensure that concerns expressed are given proper consideration;

d. Reassure employees that they will be protected from possible reprisals or victimization where there is reasonable belief that a disclosure has been made in good faith.

2.6 Tangerine Life requires that whistleblowing disclosures are made internally and not to external sources. Where external whistleblowing is done, it could be regarded as a malicious act, intended at hurting the Company.

### **3. Open Culture**

3.1 Tangerine Life upholds a culture of openness, transparency and accountability, hence, the Company encourages an open and positive approach to whistleblowing.

3.2 Rather than ignoring a problem, Employees, business associates and other stakeholders alike, are encouraged to disclose all reportable events that come to their notice, with the assurance that all information provided will be treated as confidential in nature and only shared with appropriate parties.

3.3 The Company shall investigate all allegations and issues of serious concern brought to its notice and shall take appropriate actions to address such concerns.

3.4 Consequently, Employees who do not comply with the provisions of the policy could be subject to appropriate disciplinary actions.

### **4. Related Documents**

1. Tangerine Life Code of Ethics and Conflict of Interests Manual

### **5. Scope**

5.1 The Whistleblowing Policy provides for the reporting of all genuine concerns within any aspect of the Company's operations and involving employees or any party that has a business relationship with Tangerine Life. These concerns shall include:

- Conduct that is against Tangerine Life code of conduct, rules, procedures, and policies, or established standards of practice;
- Conduct that amounts to fraudulent or illegal act as defined within the Tangerine Life Code of Ethics and Conflict of Interests Manual including theft and corrupt practices.
- Unethical conduct according to measures of standard practice within the Company.

- Conduct that amounts to misuse of Tangerine Life's resources, including business information;
- Conduct that makes you feel uncomfortable in terms of your experience with the standards you believe the Company upholds;
- Conduct that amounts to wilful or negligent instances of non-performance of duties including abuse of office;
- Health and safety violations
- Insider dealing and illegal information brokerage
- Commission of a crime
- Failure to comply with any legal obligations
- A miscarriage of justice
- Damage to the environment

5.2 Conduct becomes reportable when it happens or when it is reasonably likely to occur.

5.3 The Company may be endangered if any of these conducts is left unchecked. Importantly, in determining whether to disclose a reportable incident, harm done to the Company is not solely measured in terms of financial loss or damage to a particular business, but harm is equally measured with regards to any damage done to the Company's integrity and reputation.

## **6. Confidentiality**

6.1 All information obtained from a Whistleblowing Report shall be considered Confidential and would not be disclosed or discussed with other persons, except for the purpose of the investigation or where the Company has a legal or regulatory obligation to disclose.

6.2 Any individual, who reports, provides or obtains information as part of the investigation of a reported misconduct must not disclose or discuss the information or the investigation with other persons, internal or external.

6.3 Any breach of this Confidentiality would be treated in accordance with the Disciplinary Process as stipulated within the Tangerine Life Staff Manual.

## **7.Reporting**

An individual who observes, or becomes aware of a reportable misconduct, as defined within the Policy, has an obligation to report that conduct. Reports must be made in accordance with the requirements stipulated below.

### **7.1 Whistleblowing Channels**

- a. Head Internal Audit – Whistleblowing Portal
- b. Chief Legal/Compliance Officer- Whistleblowing Portal
- c. MD/CEO- Whistleblowing Portal
- d. Tangerine Life Website – Whistleblowing Portal
- e. Dedicated Phone line

### **7.2 Minimum Information Required for a Whistleblowing Report**

1. Name of officer(s) involved
2. Nature of Misconduct
3. Date of Occurrence
4. Estimated value of loss to the Company (if any)
5. Specific evidence of occurrence of the Misconduct

## **8. Confidential & Anonymous Whistleblowing**

The Company wishes to assure the safety of whistleblowing, and therefore provides whistle blowers with the option of either confidential whistleblowing or anonymous whistleblowing.

### **8.1 Confidential Whistleblowing**

A whistle blower is encouraged to reveal his or her identity when a report or disclosure is made using any of the channels mentioned above. This approach helps the investigation significantly, as the Whistle blower can be contacted to provide further details on the report, where necessary.

### **8.2 Anonymous Whistleblowing:**

However, a whistle blower may choose not to reveal his or her identity upon making a report. With the reporter's anonymity thus assured, the identity of the reporter cannot be ascertained by anyone. Should this approach be chosen, the Whistle blower must ensure that enough information is provided to enable a thorough investigation.

**8.3** Whistle blowers should endeavour not to discuss the details of the reported misconduct with other persons, except as part of the investigation so as to ensure protection of all parties involved and not to jeopardise the investigation process.

## **9. Whistle blower Protection**

9.1 An employee making a Whistleblowing Report in good faith may do so without fear of retaliation or occupational prejudice. However, this protection is forfeited if it is found that the report was deliberately falsified or made with malicious intent.

9.2 Retaliation and occupational prejudice are in themselves misconducts, and when established, must be immediately escalated to the Audit and Compliance Units and would be handled through appropriate disciplinary proceedings as stipulated in the Tangerine Life Staff Manual.

## **10. False Allegations & Complicity**

10.1 Falsified and malicious allegations made through the Whistleblowing System would be considered misconduct and when established, would result in disciplinary actions taken against the employee as stipulated within the Tangerine Life Staff Manual.

10.2 Reporting under this policy does not immunize or shield a whistle blower against action following from his or her intentional misconduct, which includes wilfully participating in the reported misconduct.

## **11. Investigation and Follow-up**

11.1 The Company is committed to investigating and addressing all cases of reported misconduct. Instances of suspected fraud and corrupt activities shall be investigated in accordance with the Tangerine Life Staff Manual.

11.2 All other instances of misconduct shall be assessed by the Internal Audit and referred to the appropriate Unit for investigation and necessary action. The Internal Audit Unit shall follow-up to ensure that the report is properly investigated and adequately addressed.

11.3 All persons involved in the investigation of a reported suspicion in accordance with this policy will have access to all records, data, and information pertaining to the investigation.

11.4 Failure of any employee to assist in an investigation; or an intentional obstruction of the progress of an investigation by an employee would be considered a breach of contract and may result in disciplinary actions taken against the employee.

11.5 Interaction with law enforcement agencies would occur as it is deemed necessary and in accordance with the Tangerine Life Anti-Fraud Policy. As appropriate, relevant Regulators would be informed of allegations and the subsequent outcome of investigations.

11.6 The whistle blower may seek follow-up information about the investigation of a report, escalated using the confidential whistleblowing option, or any consequent action taken by Tangerine Life.

## 12. How to Raise Concerns

12.1 As a first step, Whistle Blowers should raise concerns with their line managers or superiors. This however depends on the seriousness and sensitivity of the issues involved and who is thought to be involved in the malpractice. For example, if it is believed that Management is involved, the Internal Audit Team or Human Resources should be approached.

12.2 Concerns are better raised in writing but if the whistle blower does not feel comfortable to put his or her concern in writing, the Internal Auditor or any other designated officer as may be applicable may at his/her discretion decide to receive a complaint made by telephone or in person at a meeting. Written concerns should set out the background and history of the concern, giving names, dates and places (if known). In order to ensure the confidentiality of any expression of concern it is suggested that Whistle Blowers send their letter/written note in a sealed envelope addressed to the Internal Auditor and clearly marked as **"Strictly Private and Confidential - To be opened by addressee only."**

## 13. Escalation

- Reported misconducts involving an employee shall be escalated to the Head, Internal Audit and the employee's line manager
- Reported misconducts involving a Departmental Head shall be escalated to the Head, Internal Audit and the MD/CEO.
- Reported misconducts involving a member of Senior Management, with the exception of the Chief Compliance Officer, the Head Internal Audit or the MD/CEO, shall be escalated to the Head Internal Audit or the MD/CEO,
- Reported misconducts involving the Chief Compliance Officer, the Head Internal Audit or the MD/CEO shall be escalated to the Chairman, Board Audit and Compliance Committee.

## 14. Assurance

The Internal Audit Unit has the responsibility of auditing the processes related to the reporting and investigation of all misconducts reported in accordance with the Whistleblowing Policy.

## 15. Monitoring and Reporting



- 15.1 The Internal Audit Unit shall be responsible for monitoring and reviewing whistleblowing activities.
- 15.2 Reports on whistleblowing information shall be provided to Senior Management on a monthly basis and to the Board Audit and Compliance Committee on a quarterly basis.
- 15.3 All employees shall be required to sign an annual declaration, stating that they have complied with the Tangerine Life Whistleblowing Policy.

#### Declaration

I hereby declare that:

- i. I have read and understood the contents of the Tangerine Life Whistleblowing Policy.
- ii. I have made all required reports concerning all suspected and actual misconducts that came to my attention during the preceding year.
- iii. I undertake to report all actual or suspected misconducts that come to my notice in line with the Tangerine Life Whistleblowing Policy.

**I Agree**