



# CODE OF CONDUCT



# ABOUT THE TUNE PROTECT CODE OF CONDUCT

At Tune Protect, our Code of Conduct manual is our foundational document that defines how we are to do business the right way, with the highest standards of integrity, ethics and good corporate governance. The Board of Directors and senior management team join all personnel in applying the Code of Conduct as a team in a joint effort to sustain our company's good reputation, growth and success by observing the 3 Pillars of Respect in our workplace, for our business partners and for our shareholders.

In our untiring strive for excellence as law abiding corporate citizens, we look to our Code of Conduct that declares we have **ZERO TOLERANCE AGAINST BRIBERY AND CORRUPTION** and that we are committed to providing fair treatment to our customers. These are solid cornerstones of our corporate culture that provide clarity and certainty.

The Code of Conduct is not only an internal guideline but also extends to our in-house contractors, subsidiaries, and affiliates. It serves as a public declaration of our commitment to professional integrity, available on our official website for transparency and alignment of expectations with all stakeholders. This document underlines our dedication to lawful and ethical business practices, ensuring our reputation for excellence is upheld in every interaction.





**RESPECT  
IN OUR  
WORKPLACE**



# RESPECT IN OUR WORKPLACE



**“IT’S ALL ABOUT MAKING OUR WORKPLACE A FRIENDLY, FAIR AND SAFE PLACE FOR EVERYONE. WE VALUE EVERY INDIVIDUAL’S UNIQUE BACKGROUND AND MAKE SURE OUR WORKFORCE STAYS HEALTHY, BOTH IN BODY AND MIND.”**

**- Yap Hsu Yi, Chief - People & Culture**

**Treat others as how you would want to be treated.**

## Diversity & Inclusion

“Diversity” is defined as the characteristics that make each and every one of us unique such as ethnicity, gender, age, national origin, disability, sexual orientation, education, religion, marital status, lifestyles, work experiences and any other differences. We at Tune Protect value our people and acknowledge that each has his or her own experiences and perspectives in creating a successful working environment.

Our intention is to create and retain a diverse workforce as we believe this will lead us to outperform our peers. All of us play a part in promoting diversity and inclusion when we:

- Respect the differences in each other’s talents, abilities and experiences.
- Value the input of others.
- Foster an atmosphere of trust and openness.

**It’s simple - we do not discriminate.**





## Anti-Discrimination

We believe in equal opportunity in the workplace; we must always act fairly and give qualified individuals the chance to develop their abilities and advance within our Company. In Malaysia, behaving in a respectful manner means never discriminating or treating employees or job applicants unfairly in accordance with the Employment Act 1955 and Industrial Relations Act 1917. For Tune Protect Thailand and Tune Protect EMEA, please refer to your country-specific legislation protecting against discrimination.

This applies in all matters including recruiting, hiring, training, promoting, compensation or any other terms and conditions of employment. Decisions regarding employees and applicants must always be based on merit, qualification and job-related performance without reference to non-job-related characteristics such as:

- Race, color, ethnicity, or national origin
- Gender
- Sexual orientation
- Age
- Religion
- Disability
- Family / personal relationships

## Anti-Harassment

We provide a workplace that is free from harassment of any kind and / or any other offensive or disrespectful conduct. Our Company complies with our country's local laws prohibiting harassment at the workplace. Harassment includes unwelcome verbal, visual, physical or any other conduct of any kind that creates an intimidating, offensive or hostile work environment. While the legal definition of harassment may vary by location, we consider the following non-exhaustive list of unacceptable behaviour:

- Sexual harassment (applies to both genders).
- Offensive language or jokes.
- Racial, ethnic, gender or religious slurs.
- Insulting comments.
- Intimidating or threatening behaviour.
- Showing hostility towards others because of individual characteristics.
- Riotous, disorderly behavior or committing nuisance at workplace premises; this includes fighting and / or other physical abuse.
- Leap-frogging and habitually going directly to a superior instead of the person directly in charge with the intention of sidelining the immediate authority without a cause or reason.

You should never act in any form of harassing manner or cause your co-workers to feel uncomfortable in our work environment. It is also important to remember that harassment, whether sexual or otherwise, is determined by your actions and how they impact others, regardless of your intentions.

What is sexual harassment? Sexual harassment can be in the form of sexual coercion and sexual annoyance. In Malaysia, the Employment Act 1955 protects against sexual harassment, which is defined as “any unwanted conduct of a sexual nature, whether verbal, non-verbal, visual, gestural or physical, directed at a person which is offensive or humiliating or is a threat to his well-being, arising out of and in the course of his employment”.

Section 509 of the Penal Code Act 574 also recognizes sexual harassment as a jailable criminal act. Please refer to your country-specific legislation protecting against sexual harassment. Sexual harassment may consist of verbal, visual or physical conduct of a sexual nature that is unwelcome or makes someone feel uncomfortable. Specific conduct that can constitute sexual harassment includes, but is not limited to:

- Unwanted sexual advances.
- Subtle or expressed pressure for sexual favours.
- Sexual innuendoes, advances or propositions.
- Verbal abuse of a sexual nature.
- Graphic comments about an individual's body.
- Leering, whistling, touching, pinching, assault, coerced sexual acts or suggestive, insulting or obscene comments or gestures.
- Display of sexually suggestive objects or pictures in the workplace (including through electronic mail or by downloading such material from the internet).
- Staring, stalking and photographing / video filming without permission or inappropriately.

If you are or know of someone else that is the subject of discrimination or harassment, speak up and report it. You can do so by informing your Line Manager / Function Head / People and Culture.

**You may refer to our Group Sexual Harassment Policy for further information.**

## **Anti-Violence**

We expect everyone to be treated with courtesy. Employees are to refrain from fighting or any other conduct that may be harmful or dangerous to others. Behavior that threatens, intimidates or coerces another employee, customer vendor or business associate will not be tolerated. Indirect or direct threats of violence as well as suspicious individuals should be reported to your Function Head or People and Culture immediately and your report should be as specific and detailed as possible. You should not place yourself in peril nor should you attempt to intercede during an incident.

Tune Protect takes a serious stance against all forms of provocation and violence by our staff or guests and will refer such matters to the building security or the Royal Malaysian Police, The Royal Thai Police and the Dubai Police Force, whichever is applicable, if the situation warrants.

## Safety & Health

The Safety & Health of all in Tune Protect is the responsibility shared by Tune Protect and all employees. It is shared responsibility because our workplace is our second home and that we all have the joint responsibility to keep our workplace safe and sound. In Malaysia, we aim to maintain a quality, safe and healthy workplace and system which is free from any hazard or risk in accordance with the requirements set out by the Occupational Safety & Health Act (Amendment) Act 2022.

We encourage you to abide by safety requirements and should you encounter any unsafe area or process, please inform People and Culture or your Group Occupational Safety and Health (GOSH) Coordinator / Fire Marshal / team member immediately. For Tune Protect Thailand and Tune Protect EMEA, please refer to your country-specific legislation promoting Safety and Health and to your GOSH Coordinator / Fire Marshal / team member.



Drug and alcohol abuse will pose a direct significant threat to our goal in protecting the safety, health and well-being of our employees. We are committed to ensuring a substance-free working environment for all our employees. We strictly prohibit the illicit use, possession, sale, conveyance, distribution or manufacture of illegal drugs, intoxicants or controlled substances in any amount or in any manner. A reasonable suspicion may be based on objective symptoms such as the employee's appearance, behavior or speech. If there is a reasonable suspicion that an employee's use of drugs and / or alcohol may be adversely affecting his or her job performance or another employee's job performance or the safety of his or her own self and of others in the workplace, the manager may request an alcohol and / or drug screening.

Highly infectious diseases such as COVID-19 can infiltrate the workplace at the blink of an eye and disrupt efficiency. As such, we all have an important role to play in making our workplace a safe place to conduct business. Safety must always be at the top of our minds. And so, we must make the special effort to prevent cross-infections, even if it means staying away and working from home when we feel unwell. We must be considerate and use good foresight to prevent cross infecting our colleagues and preserve everyone's good health and well-being in line with established SOPs and guidelines provided by the World Health Organization and the United Nations Sustainable Development Goal No. 3 promoting Good Health & Well-Being.





**RESPECT  
FOR OUR  
BUSINESS  
PARTNERS**



# RESPECT FOR OUR BUSINESS PARTNERS



**“WE OPERATE ETHICALLY, RESPONSIBLY AND WITH INTEGRITY. WE RESPECT AND SEEK TO BUILD RELATIONSHIPS WITH BUSINESS PARTNERS WHO SHARE THE SAME VALUES IN DOING THE RIGHT THING TOGETHER.”**

**- Tan Eng Eng, Chief Risk & Compliance Officer**

## Conflict of Interest

Our conflict of interest policy is simple – all business decisions must be made solely in the best interests of the Company. In reaching these decisions, an employee must not be swayed by personal or family considerations which may consciously or unconsciously affect his or her judgement as to what is right for the Company. Conflicts of interest may arise when an employee or a family member:

- Owns, directly or indirectly, an interest in any competitor, supplier, agent, contractor, sub-contractor, customer, person or organization doing business with the Company or its affiliates.
- Acts in any capacity including as a director, shareholder in a private limited Company, officer, partner, consultant, employee, distributor, agent, or the like for a competitor, supplier, agent, contractor, sub-contractor, customer, person or organisation doing business with the Company or its affiliates.
- Engage in activities that compete with or appear to compete with the Company's interests.
- Allows business decisions to be influenced, or appear to be influenced, by personal or family interests or friendships.
- Engage in any non-Company activities during official working hours, unless prior permission has been obtained.
- Use Company property, information or resources for personal benefit.
- Has outside employment that negatively affects your job performance or interferes with your responsibilities.
- Hires, supervises or has a direct or indirect line of reporting to a family member or someone with whom they have a romantic relationship.
- Accepts personal benefit directly or indirectly from a competitor, supplier, contractor, customer, person or organisation doing business with or expecting to do business with the Company or its affiliates. Gifts, travel, entertainment or other forms of “gratitude” of more than nominal value are deemed to constitute a “personal benefit”. This paragraph excludes loans from insurance companies, commercial and saving banks at normal rate of interest.



**All conflicts of interest must be disclosed to the Company in writing by email and without any delay, to your Line Manager and Function Head, with a copy to People & Culture and Integrity too. Having a conflict of interest is not necessarily a violation but failing to disclose it is.**

Employees may disclose an actual or potential conflict via the following ways:

- Connect with your Group People & Culture and Group Integrity on the procedures for disclosure and make you sure abide by it.
- If you are subject to our Annual Integrity Month Campaign (AIM) Online Training, you must also make the disclosure as part of the process. You must continue to make the disclosure every year as long as the conflict exists.
- All employees are required to fill out the Conflict-of-Interest Declaration and Integrity Pledge (COI) annually.
- All prospective employees are also required to make the necessary declaration on the Employee Application Form filled out by all candidates applying for employment with us.

## **Anti-Bribery and Corruption**

**In line with the Company's policy and ZERO TOLERANCE AGAINST BRIBERY AND CORRUPTION, the Company has put in place the Anti-Bribery and Corruption ("ABC") System to consolidate and manage elements, policies, objectives and processes in relation to bribery and corruption risks in the Company.**

**You are required to comply with the [Group Anti-Bribery & Corruption Policy \(Group ABC Policy\)](#), Section 17A of the Malaysian Anti-Corruption Commission (Amendment) Act 2018 that imposes statutory criminal corporate liability and all other relevant anti-bribery and corruption policies and laws.**

Bribery is the offering, promising, giving or accepting of anything in value (cash or in kind) to or by another person to obtain or retain a business or other advantage other than by legitimate and proper means. Corruption means misuse of position of power to obtain or attempt to obtain a personal benefit or advantage (including kickbacks).

Bribery and corruption arrangements with customers, suppliers, agents, contractors, sub-contractors, competitors, government officials, representatives of government parties or any other third parties are strictly prohibited. Tune Protect operates a **ZERO TOLERANCE AGAINST BRIBERY AND CORRUPTION** and will deal with any instance of suspected bribery or corruption seriously. Any actual instance will result in disciplinary action against those involved, up to and including termination of employment or contract, and reporting of those persons to relevant regulatory and criminal authorities. The Company will support those authorities in any prosecution brought against those persons.

Basic DOs and DON'Ts include:

- DON'T directly or indirectly (e.g. via suppliers, agents, distributors, consultants, contractors or anyone else) offer or give bribes or improper advantages (including facilitation payments) to any public official or other individual or third party, which are or give the impression that they are intended to influence decisions by any person about Tune Protect.

- DON'T request or receive bribes or improper advantages from any third party, which may, or give the impression that they may be intended to influence decisions by Tune Protect about that third party.
- DO immediately report any suspected violations of the policy to Group Integrity.
- DO strictly comply with the strict guidelines on our "No Gift Policy", Donations & Sponsorships, Hospitality & Entertainment and Facilitation / Extortion Payment set out in the Group ABC Policy.
- DO continually monitor the Company's consultants, agents, contractors, business partners, or any other kind of third-party intermediary acting to further the Company's interests for "red flags" indicating the potential for a policy violation. If you believe a "red flag" exists, please inform any of the individuals indicated above.

Corrupt and bribery activities are not only a Code violation but can also be a serious violation of criminal and civil anti-bribery and anti-corruption laws in Malaysia and in other countries.

Malaysian laws against bribery and corruption are being tightened to help stamp out in commercial organizations. Tune Protect's Board of Directors and Management Team are also actively overseeing matters to prevent bribery and corruption in Tune Protect because they are serious offences under the Malaysian Anti-Corruption Act 2009 (Act 694) and the following acts are jailable offences:

- Soliciting / Receiving Gratification (Bribe).
- Offering / Giving Gratification (Bribe).
- Intending to Deceive (False Claim).
- Using Office or Position for Gratification (Bribe / Abuse of Power / Position).
- Knowingly failing to report an act of offering / giving bribes.

In Thailand, the Organic Act on Counter Corruption B.E. 2561 (2018) has shifted focus from government officials to cover individuals, private corporations and investors under the Non-Life Insurance Act B.E. 2535 (1992) of Thailand (4th Amendment).

In Dubai, a number of federal and local laws, such as the Federal Law No. 3 of 1987 (as amended) (the "Penal Code"), apply to fight against bribery and corruption.

### **Reject Bribery and Corruption!**







## Anti-Money Laundering

Tune Protect Group Berhad, our holding company, is a financial services company that is regulated by the Bank Negara Malaysia / Malaysia Central Bank. It is imperative that we protect the Company's reputation and avoid criminal liability linked to criminal activities of others, which is in contravention of the Anti-Money Laundering & Anti-Terrorism Financing and Proceeds of Unlawful Activities Act 2001 (AMLA). We need to ensure we do not receive or assist to transfer money from the proceeds of criminal activities as this can result in the Company being implicated as a partner in money laundering activities. For Tune Protect Thailand and Tune Protect EMEA, please refer to your country-specific legislation prohibiting Money Laundering.

To protect the Company's reputation and to avoid criminal liability, it is important that we do not become implicated in the criminal activities of others. We need to ensure we do not receive or assist to transfer money from the proceeds of criminal activities as this can result in the Company being implicated as a partner in money laundering activities. Employees should report any suspected cases of money laundering activity to Local or Group Compliance. Possible signs of money laundering activity include the following:

Supplier requests to:

- Overpay
- Split payments into several bank accounts.
- Pay funds into a bank account that is of a different name.

Customer payments to Tune Protect:

- Paid by someone else.
- Paid from multiple bank accounts.
- Paid from a foreign bank (from overseas) although a local customer.
- Payment made in cash when typically made electronically or via cheque.

Other signs to look out for may include:

- Early termination of a policy, especially at a loss, or where cash was tendered and / or the refund cheque is delivered to a third party.
- A transfer of the benefit of a policy to an apparently unrelated third party.
- Potential customers are reluctant to provide normal information when applying for a policy, providing minimal or fictitious information or providing information that is difficult or expensive for the Company to verify.

There are numerous other scenarios that may indicate the possibility of a laundering attempt. If you are unsure, please seek advice or guidance from your Line Manager or Function Head.

## Business Gifts and Entertainment

You are not to offer or receive any gift (in cash, kind or via services) that improperly or appears to improperly influence business decisions. We acknowledge that hospitality is important in building relationships with customers / clients, agents and other business partners. It is sometimes appropriate to give out or accept reasonable gifts, i.e. during product launches, campaigns, etc. However, as the practice of giving and receiving gifts can be subject to a wide interpretation, you are required to strictly follow the “No Gift Policy” set out for business gifts and entertainment in the Group ABC Policy.

*Gifts to government officials:* Please note that in many jurisdictions, giving or offering a simple gift or meal to a government official can be illegal. You must obtain prior written approval from your Line Manager or Function Head before giving or offering any gift, meal or entertainment.

## Commitment to Fair Treatment of Financial Consumers

As a financial services provider, we are dedicated to the principles of Fair Treatment of Financial Consumers (FTFC), as stipulated by Bank Negara Malaysia. We believe that the consumer is at the heart of our operations, and our actions and policies are designed to reflect this commitment.

Our approach is based on seven fundamental principles:

- **Corporate Culture:** The board of directors and senior management set a clear expectation that FTFC principles are integral to our corporate culture and values.
- **Fair Terms:** We ensure that all financial consumers are provided with fair and mutually beneficial contractual terms.
- **Provision of Information:** We are committed to providing clear, relevant, and timely information about all our financial services and products.
- **Fair Dealing:** Our staff, representatives, and agents are expected to handle all consumer interactions with the utmost care, skill, and diligence.
- **Advice and Recommendations:** We take great care to ensure that all advice and recommendations are suitable for our consumers' needs.
- **Redress:** We handle all consumer complaints and claims promptly, fairly, effectively, and professionally.
- **Vulnerable Consumers:** Our staff, representatives and agents are expected to treat vulnerable consumers fairly and equitably.

These principles are supported by guidelines and requirements set forth in our Customer Service Charter and Treat Customers Fairly Charter, available for review on our website. All employees are expected to understand and adhere to these principles and guidelines to ensure that every consumer interaction reflects our commitment to fairness and professionalism.



**RESPECT  
FOR OUR  
SHAREHOLDERS**



# RESPECT FOR OUR SHAREHOLDERS



**“TRANSPARENT COMMUNICATION, FAIR TREATMENT, AND DELIVERING VALUE ARE AMONG THE KEY QUALITIES EXPECTED BY SHAREHOLDERS. IN TUNE PROTECT, WE PRACTICE TIMELY AND REGULAR UPDATES, FINANCIAL TRANSPARENCY AND ADHERENCE TO ETHICAL BUSINESS PRACTICES, ALL TO BUILD TRUST AND RESPECT FOR OUR SHAREHOLDERS.”**

**- How Kim Lian, Group Chief Executive Officer**

## Maintaining Accurate Business Records

The financial reports and other information that is prepared by Tune Protect and the financial information provided to shareholders, regulators and other stakeholders must be accurate, complete and kept safely to meet with the requirements of various legislation such as your local Companies Act, taxation laws and other relevant laws. Our records provide valuable information for the business and evidence of our actions, decisions and obligations. Procedures and processes must be in place to ensure that transactions are properly authorised and accurately recorded. Any failure to record transactions accurately or falsifying or creating misleading information or influencing others to do so, could constitute fraud and result in fines or penalties for employees or for the Company.

Basic Dos and Don'ts include:

- DO record all transactions promptly and accurately.
- DO perform only authorised transactions.
- DO ensure that transactions recorded are legitimate and accompanied by legitimate documentation where required.
- DO ensure that all records are sufficiently and appropriately retained.
- DON'T inflate or shift sales, expenses or profits between reporting periods to obtain a more favorable financial outlook.
- DON'T falsify, omit or hide Company documents, relevant financial information for whatever reason.

## Fraud

Sections 24 and 25 of the Penal Code covers fraudulent offences with dishonest intent which lead to cheating, criminal breach of trust, criminal misappropriation and theft in Malaysia. For Tune Protect Thailand and Tune Protect EMEA, please refer to your country-specific legislation prohibiting such acts.



Examples of fraud include:

- Improperly handling or reporting of money or financial transactions.
- Falsifying or presenting falsified medical records to obtain medical or leave benefits.
- Falsifying any Company document.
- Overstating time sheets in order to inflate overtime payments.
- Altering sales numbers or manipulating accounts in order to meet targets for self and / or others.
- Failing to disclose close relationships with competitors, partners, agents, suppliers, contractors, consultants or other third parties that may give rise to conflict of interest (see section on *Conflict of Interest*).
- Unauthorised sale of Company assets for personal gain.
- Use of corporate credit cards for personal expenses.
- Taking Company supplies for personal use.
- Profiteering as a result of insider trading activities.

You are required to report all instances or suspected instances of fraud to your local Compliance representative and / or Group Compliance. If you are aware of instances of fraud being committed and are silent, you can also be charged as an accomplice to fraud.

## Confidential Information

While working at Tune Protect, we have access to a wide variety of information about the Company, our employees, customers and business partners, much of it will be confidential. We must safeguard Company information and any other information that is entrusted on us. Pointers on how to manage confidential information:

- DO distribute or share the Company's information on a need-to-know basis, ensuring that only Tune Protect employees or others working for Tune Protect, or authorised third parties, with a genuine business need, have access to the information.
- DON'T disclose the Company's information in public places, including taking all necessary steps to protect documents and IT devices away from the workplace.
- DON'T disclose Tune Protect's information externally to third parties unless authorized.
- DON'T use Company information for anything other than a legitimate business purpose or as required by law.

In Malaysia, personal data relating to employees and consumers is managed in accordance with the Personal Data Protection Act 2010.

In Thailand, the Personal Data Protection Act B.E. 2562 (2019) applies, and Data Protection Law 2007 is applicable in Dubai. If you are unsure how to handle any Company information, restricted or otherwise, please seek advice from your local / Group Compliance representative.

## Insider Trading

In the course of doing your job, you may be privy to confidential and non-public information about the Company, suppliers or other partners. It is every employee's obligation to safeguard this information, and you should not disclose non-public information to anyone outside our Company including family members and friends.

Specifically, employees are not allowed to trade in securities of Tune Protect or another company which does business with Tune Protect while in possession of non-public material information.

In Malaysia, an employee found guilty of Insider Trading contrary to Section 188(2)(a) of the Capital Market & Services Act 2007 (Act 671), may be liable to a jail term, a fine or both. For Tune Protect Thailand and Tune Protect EMEA, please refer to your country-specific legislation that prohibits Insider Trading.

## Anti-Hedging

Members of the Tune Protect senior management team and other relevant parties must not be engaged in any personal hedging strategies and liability-related insurance that will undermine the risk alignment effects embedded in their remuneration.

## Human Rights & Ethical Conduct

Tune Protect rejects all forms of human rights infringements and unethical conduct which includes prostitution, child labour, forced labour, modern slavery and human trafficking. Although non-existent in Tune Protect and not directly relevant to our day-to-day operations, we are aware that such conduct may be prevalent elsewhere.

Acknowledging the possibility that the Company may be unknowingly implicated in such negative activities through the normal course of business, Tune Protect unequivocally disassociates itself from human rights infringements and denounces all unethical and illegal conduct in accordance with the United Nations Guiding Principles on Human Rights and the United Nations Sustainable Development Goal No.8 promoting Decent Work & Economic Growth.



## External Communications

All external communication will be handled and managed by authorised persons within the Company. Only authorised persons may speak to the public on behalf of Tune Protect and the information they provide must be accurate, fair, correct and timely.

You must not give the impression that you are speaking on behalf of the Company in any public forum. Specifically, while using social media, the following should be observed:





- Please state that the comments or opinions posted are your own and not the view of the Company.
- Please take extra precautions to ensure that you do not divulge non-public, confidential information about the Company.
- If you are contacted by any external party to speak on Company business affairs, please refer them to the Group Corporate Communications or Investor Relations representative.

## **Intellectual Property**

Malaysia is a party to a series of agreements, treaties and conventions protecting intellectual property rights such as the World Intellectual Property Organization Copyright Treaty ("WIPO") and the Agreement on Trade Related Aspects of Intellectual Property Rights (TRIPS Agreement), that work to protect owners against theft and copycats. Thailand is a party to the Paris Convention for the Protection of Industrial Property, the Patent Cooperation Treaty and the Agreement on Trade-Related Aspects of Intellectual Property rights 1994. Similarly, UAE is a member of the Rome Convention and signatory to TRIPS Agreement. These memberships connote the vital need to protect intellectual property that we have invested in.

Our Company's intellectual property rights (our trademarks, logos, copyrights, trade secrets, "know-how", patents and any work produced by a Tune Protect employee) are among our most valuable assets. Unauthorised use can lead to loss or serious loss of value for the Company. Any use of our trademarks and logos must be cleared in advance by our Group Branding team. If you are aware of any misuse or suspected misuse of trademarks, logos and / or other intellectual property, please report these incidences to Group Compliance.

## **Email, Internet and Information Systems**

The internet is made available via WIFI or a cable to your desktop, laptop and mobile device. We trust you will not abuse this freedom and use this facility responsibly. Please refer to the Company's ICT Policies for acceptable use as well as the obligations and expectations on employees, be it permanent, contracted, or interns of the Company, including affiliates and contractors, who uses the Company's IT facilities for Internet and email purposes.

All employees are required adhere to the guidelines set out by our IT team and the company will not be held responsible for any violation that may lead to investigation by the enforcement authorities.



# ADMINISTRATION & REPORTING

# REPORTING

**EMPLOYEES ARE ENCOURAGED  
TO CONTACT YOUR LOCAL OR  
GROUP PEOPLE & CULTURE OR  
GROUP INTEGRITY  
REPRESENTATIVE FOR  
ASSISTANCE.**

Questions, grievances and feedback may be referred or reported to the following parties:

| PILLAR OF RESPECT   | REPORTING CHANNELS   |
|---|--|
| <b>RESPECT IN OUR WORKPLACE</b><br>Diversity & Inclusion<br>Anti-Discrimination<br>Anti-Harassment<br>Anti-Violence<br>Safety & Health<br>List of Misconduct  | Group People and Culture<br><a href="mailto:group.people@tuneprotect.com">group.people@tuneprotect.com</a> |
| <b>RESPECT FOR OUR BUSINESS PARTNERS</b><br>Conflict of Interest<br>Anti-Bribery and Corruption<br>Anti-Money Laundering<br>Business Gifts and Entertainment<br>Fair Treatment of Financial Consumers   | Group Integrity<br><a href="mailto:group.integrity@tuneprotect.com">group.integrity@tuneprotect.com</a>    |
| <b>RESPECT FOR OUR SHAREHOLDERS</b><br>Maintaining Accurate Business Records<br>Fraud<br>Confidential information<br>Insider Trading<br>Anti-Hedging<br>Human Rights & Ethical Behaviour<br>External Communications<br>Intellectual Property<br>Email, Internet and Information Systems | Group Integrity<br><a href="mailto:group.integrity@tuneprotect.com">group.integrity@tuneprotect.com</a>    |





## Whistleblowing

The Company has put in place a [Group Whistleblowing Policy](#) to uphold the highest standards of professionalism, integrity and ethical behaviour in the conduct of its business and operations. The policy sets out procedures which enables employee and members of the public to raise genuine concerns regarding actual or suspected acts of bribery, corruption, fraud, money laundering, abuse of power, unethical unlawful, illegal, wrongful or other improper conduct and also sets out the process for managing any action, intimidation or harassment against a whistleblower. If you think you know of any possible violations of law or unethical conducts such as fraud, corrupt practices, misrepresentations or deliberate errors connected with our financial statements, any form of harassment or conflict between personal life and work or anything else that carries substantial risks to the Company and / or public health or safety and security, you must report it. If you wish to protect your identity, you may raise your grievances via our [Group Whistleblowing Policy](#) by emailing [whistleblowing@tuneprotect.com](mailto:whistleblowing@tuneprotect.com) . Your identity will be kept confidential when you raise concerns or report any violations of this Code.

## Investigation

All grievances and incidences reported will be reviewed promptly by the Whistleblowing Investigation Team upon receiving the instruction from the relevant Risk Management Committee Chair. Where necessary, an investigation will be carried out on the reported incident. Employees who raised the grievance or complaint may be called on to cooperate fully with the investigation. There will be no repercussions, or any action taken against any employee making a genuine complaint or report.

## Disciplinary Action

If employees are found to have violated the Code, the Company will not hesitate to take the appropriate disciplinary action. This may include termination of employment, depending on the severity of the misconduct / Code violation. Where the misconduct is a violation of law, penalties or charges may be brought upon the employee by the relevant government authorities. Our Code of Conduct mirrors existing laws and safeguards established legal principals to provide for a workplace that is free of illegal, immoral and unethical conduct, to everyone's benefit. It will be in everyone's best interest to observe this code till it becomes second nature. We have also formulated a List of Misconduct that provides a framework for good reference.

## Annual Review of the Effectiveness of the Integrity Training

Tune Protect conducts surveys at the end of the company-wide Annual Integrity Month Campaign (AIM) and the periodic trainings conducted for new hires, consultants and interns. The surveys provide the Company constructive feedback, comments and suggestions about the campaign and trainings. The feedback will be reviewed, with a view of updating the Code of Conduct Manual and making improvements to the training material, video and methodology. All training videos come are administered in English, with local translation and subtitles, where necessary. We also review all the Conflict of Interest Declaration and Integrity Pledges (COII) made by all employees during the Annual Integrity Month Campaign to ensure that all potential and real conflicts declared are investigated and are addressed immediately and effectively.



# LIST OF MISCONDUCT

# LIST OF MISCONDUCT

**THIS TUNE PROTECT LIST OF MISCONDUCT EXPRESSLY STATES BEHAVIOUR THAT GOES CONTRARY TO OUR CODE OF CONDUCT, VIEWED AS UNACCEPTABLE AT ANY LEVEL. ANY BREACH REPORTED WOULD LEAD TO A THOROUGH INVESTIGATION, DISCIPLINARY INQUIRY, REMEDIAL ACTION AND / OR INCLUDING CIVIL / CRIMINAL ACTION, WHERE APPLICABLE.**

This list is not exhaustive for very practical reasons. However, it covers many main crucial areas for all employees to observe. Other areas unlisted herein are covered by commonsensical rules of regular employment, such as “not parking on someone else’s designated parking bay without authorization”, smoking at “No Smoking Zones”, borrowing office petty cash, etc.

When in doubt, all employees **MUST** seek the advice of your respective Line Managers / Function Heads for guidance and permission. Please **DO NOT** act on HEARSAY information which can sometimes be unreliable, outdated and unauthorized.

## Respect In Our Workplace

1. Cheating on attendance by getting someone to sign in for you for work or for a certain event, when you are absent or representing yourself as having attended when in fact you were not present.
2. Being tardy, arriving late for work or leaving early, taking long breaks without a valid reason and without communicating to your Line Manager.
3. Absenteeism during working hours without notification / permission.



4. Absence Without Official Leave (AWOL) is not allowed. It is the employee's full responsibility to ascertain if your leave application has been approved before going on leave. It is also the employee's full responsibility to inform your Line Manager, Function Head and / or People & Culture as soon as possible if you encounter any difficulty, whatever it may be, that prevents you from reporting to work.
5. Inefficiency and unprofessionalism in the discharge of duties including, but not limited to, late submission of claims and documents, delay in processing and issuance of policies, delay in doing reconciliation of accounts, not keeping with work datelines and work commitments.
6. Not complying with and / or hampering pre-approved policies, procedures, directives and initiatives instituted / approved by the Management or committees.
7. Not complying with office security safeguards such as closing the office doors upon entry, allowing strangers to tailgate without referring them to the receptionist, lending colleagues your access card, circulating the entrance key(s) without authorization and permitting former staff to enter without a formal check-in
8. Not complying with Group Occupational, Safety and Health rules which includes unauthorized tampering with all lighting, electrical equipment and all other furniture and fittings, causing risk of damage / injury / death.
9. Insubordination and not complying with instructions and deadlines set by your Line Manager / Function Head.
10. Behaving contentiously with direct or indirect insults, backstabbing, malicious gossip and rumour-mongering against Tune Protect colleagues.
11. Behaving contentiously by quarrelling and / or fighting whilst on duty. This includes verbal / written racial, religious and punitive slurs / abuse against a colleague.
12. Indecent and offensive behaviour which may include fraternizing with competitors, customers, colleagues and / or any person.
13. Indecent and offensive behaviour such as discrimination of any kind, harassment, victimization, bullying, abuse, violence, indiscriminate use of obscene / vulgar language in conversation with / against colleagues.
14. Sexual harassment which includes verbal (lewd jokes, teasing, propositions, etc), visual (offensive emails, messaging, jokes, etc.) and physical (groping, hugging, blocking etc.) (Please refer to our Sexual Harassment Policy).
15. Issuing libelous poison letters, notes, negative e-mails, WhatsApp, SMS, postings, tweets, messages through all social media and / or any other communication systems which unjustifiably places Tune Protect / colleagues in a bad light that may damage the reputation of both.



16. Knowingly and intentionally verbally slandering, stating and / or circulating false information that may damage Tune Protect's and / or colleague's reputation.
17. Tune Protect does not condone retaliation under any circumstances. All misconduct must be reported immediately for formal action to be taken.
18. Employees may, on a case-by-case basis, be allowed to take home company asset(s) such as laptops, digital recorders, cameras and documents, etc. with the express permission from your Line Manager / Function Head. However, in doing so, employees are not permitted to abuse the permission accorded for personal use such as using the computer for personal further studies assignments, video gaming, photography to generate additional income, etc.
19. Challenging or frustrating any company climate action and environmental protection initiative against established SOPs such as dumping rubbish into recycling bins, recycling documents with Personal Identifiable Information (P.I.I.) instead of shredding them, removing donated items without permission and undoing any effort that goes against initiatives authorized by the Sustainability Committee.
20. When ill, especially during a pandemic, and if it concerns infectious diseases, employees are called to be considerate and use good foresight to avoid infecting others at work. This includes following established SOPs and refraining from going to the office or meeting your colleagues elsewhere and always wearing face masks if you are unwell or have come in close contact with an infected person.

## **Respect For Our Business Partners**

21. Engaging a vendor with personal direct or indirect links, such as engaging a relative with a relevant business, without going through formal approval channels, which may give rise to a suspicion of Conflict of Interest.
22. Failing to disclose that an insurance agent is a family member, relative or close friend.
23. Employees are strictly not allowed to make any insurance premium payment on behalf of someone else that may give rise to a Conflict of Interest.
24. Employees are strictly not allowed to accept / collect / refund / payout of any kind on behalf of anyone whosoever that may give rise to a Conflict of Interest.
25. Employees are strictly not allowed to bank-in payment of any kind into their personal bank accounts that may give rise to a Conflict of Interest.
26. Performing any act which Conflict of Interest which would include, but not limited to, the setting up of a competing business.
27. Failing to make a prompt disclosure to your Line Manager, Function Head, local / Group People & Culture and Group Integrity about any change in circumstances that may give rise to a Conflict of Interest.



28. Performing any act contrary to Anti-Money Laundering, Anti-Terrorism Financing and Proceeds of Unlawful Activities Act 2001.

## **Respect For Our Shareholders**

29. Fraudulent transfer of direct walk-in counter business to agents, in exchange for personal kickbacks, monetary or other gain.
30. Fraudulent alteration / tampering of any company documents, records and / or emails for any purpose whatsoever.
31. Fraudulently submitting altered / falsified documents, medical certificates, time-off slips and / or receipts (entertainment, travelling and medical claims, etc.) to defraud the company, which is an act of corruption contrary to Section 18 of the Malaysian Anti-Corruption Commission Act (MACC) 2009.
32. Misappropriating / collecting premium from agents and / or insured parties and failing to promptly remit the payment immediately thereafter to Tune Protect.
33. Misappropriation of Tune Protect's funds and / or cheating on Insurance Claims.
34. Sharing confidential information and company documents to external parties or parties within the organisation who are not supposed to have access to such information / documents.
35. Reckless / Negligent sharing of passwords with other staff and / or outsiders.
36. Recklessly / Negligently leaving computers idle when you have logged into the system, hence resulting in other staff and / or person abusing access to the system in your absence at your workstation.
37. Recklessness / Negligence at work, including, but not limited to, concealment of material information that may potentially cause financial loss to Tune Protect.
38. Recklessly / Negligently using / installing unlicensed software in computers and / or electronic devices belonging to Tune Protect.
39. Browsing / surfing the internet / online shopping during working hours, unless it is work related.
40. Viewing, using and / or downloading pornography, software and personal software from the internet.
41. Misusing confidential information, passing on and / or selling such information to external parties physically or electronically through photocopy, photography, handphone and / or other devices.
42. Receiving / sending non-approved controversial and malicious emails using Tune Protect's email account causing potential risk to Tune Protect.





- 43. Sabotage of Tune Protect's software, systems, files and documents.
- 44. Damage of Tune Protect's and / or employee's property.
- 45. Deliberate prying into private and confidential documents or matters of Tune Protect such opening mail addressed to another and / or Tune Protect related entities / parties.

• END •

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