



**Malaysian Insurance
Institute**

Whistleblowing Policy

Policy Statement and Objective

1. MII is committed to creating and maintaining a culture of integrity, openness and accountability within our organisation so that individuals feel encouraged and confident to raise any concerns relating to suspected misconduct at an early stage.
2. Recognising the negative effect which malpractice can have on the organisation, MII encourages all employees, stakeholders and members of the public to raise genuine concerns, or any suspicions on improper conduct (i.e. Misconduct or criminal offence) within MII.

Scope

1. Recognizing the abovementioned values, MII provides avenue for all employees and members of the public to disclose any improper conduct within MII and to provide protection for employees and members of the public who report such allegations. Improper conduct (misconduct or criminal offence) includes the following acts (but not exhaustive):
 - i. Conflict of Interest;
 - ii. Misuse of Position or Abuse of Power;
 - iii. Misuse of Information;
 - iv. Integrity and accuracy of record and transaction;
 - v. Violate 'No-Gift Policy';
 - vi. Suspected fraud or criminal offences;
 - vii. Unlawful activities such as corruption, bribery or blackmail;
 - viii. Misuse of Company's property;
 - ix. Non-Compliance with procedure;
 - x. Criminal breach of trust;
 - xi. Unethical behaviour or improper conduct;
 - xii. Abuse of position for any unauthorised use or for personal gain;
 - xiii. Failure to comply with legal or regulatory requirements;



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- xiv. Miscarriage of justice;
- xv. Conduct of unfair competition internally or externally, by using of an individual's position or opportunity arising from/available within the company and that the gains/advantages of the individual are conditional on the losses of others, where the gains/advantages are made in ways which are illegitimate or unjust;
- xvi. Deliberate concealment of any of the above matters or other acts of wrongdoing.

The above list is not exhaustive and includes any act or omissions, which if proven, will constitute an act of misconduct under MII's Code of Ethics and Practices or any criminal offence under relevant legislations in force.

2. This policy is not to invalidate the Staff Discipline and Grievance Policy but to provide more avenues for employees, stakeholders and members of the public to disclose improper conduct committed or about to be committed to MII. This Policy is intended to cover concerns that are made in the public interest.
3. If the matter is of an individual or personal nature it shall be pursued through the Staff Discipline and Grievance Policy and Procedure. Examples of matters that are individual or personal in nature are complaints relating to discrimination, victimisation or harassment.
4. This Policy applies to all employees and stakeholders of MII, as well as members of the public.

Protection to Whistleblower

1. A whistleblower will be accorded with protection of confidentiality of identity, to the extent reasonably practicable. In addition, an employee who whistleblows internally will also be protected against any adverse and detrimental actions for disclosing any improper conduct committed or about to be committed within MII, to the extent reasonably practicable, provided that the disclosure is made in good faith.





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2. Such protection is accorded even if the investigation later reveals that the whistleblower is mistaken as to the facts and the rules and procedures involved.
3. Any disclosure made under this Policy will be treated as far as reasonably practicable in a confidential and sensitive manner. If confidentiality is not reasonably practicable, for instance, because of the nature of the information, this will be explained to the whistleblower.

Anonymous Whistleblower

Any anonymous disclosure will not be entertained. Any employee or member of the public who wishes to report improper conduct is required to disclose his/her identity to the Company in order for the Company to accord the necessary protection. However, the Company reserves its right to investigate into any anonymous disclosure.

Disclosure

1. A whistleblower may report his/her concerns to the designated email at AuditComChairman@mii.org.my.
2. The report should contain the following information:
 - i. Type of misconduct or wrongdoings;
 - ii. Name of person(s) involved;
 - iii. Time, location and dates of misconduct or wrongdoings occurred;
 - iv. How the misconduct or wrongdoings were perpetrated;
 - v. Other witnesses to the misconduct or wrongdoings;
 - vi. Documentation or evidence where available;
 - vii. The reason why they are particularly concerned about the situation.
3. All disclosures are to be channeled in accordance with the procedures as provided under this policy.





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4. Upon the completion of the whistleblowing process and procedures, the whistleblower will be accorded the privilege to be notified on the outcome of the disclosure.

Untrue Allegations

1. If an employee makes an allegation in good faith, but it is not confirmed by investigation, no action will be taken against the employee making that allegation.
2. However, if an employee makes an allegation in a frivolous or malicious manner or for personal gain, disciplinary action will be taken against the employee making that allegation.

Review of Policy

MII will review this Policy annually and modify it if necessary, to maintain its relevance and effectiveness in accordance to the applicable laws and regulations.



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