

## Bank of America Malaysia Berhad

### Whistleblowing Process

In accordance with Bank Negara Malaysia's Corporate Governance Policy, Bank of America Malaysia Berhad ("BAMB") wishes to adopt the following whistleblowing procedure that sets out the process for legitimate concerns to be objectively investigated and addressed, and which allows individuals to raise concerns about illegal, unethical or questionable practices in confidence and without the risk of reprisal. The goal of this process is to ensure that concerns about workplace malpractice at BAMB are raised and dealt with at an early stage and in an appropriate manner. This process is applicable to all BAMB employees, consultants, contractors, interns and other workers located in Malaysia.

#### The Reporting Process

Bank of America Corporation's ("BAC") enterprise Code of Conduct (the "[Code](#)") sets forth that individuals who have a reasonable belief that workplace malpractice has occurred, may be occurring or could occur in the future should report the malpractice to their direct manager or Global Compliance. Reportable concerns could include any breach of BAC policies and procedures, behavior that is inconsistent with the Code, or any behavior that harms or is likely to harm the reputation of financial well-being of BAMB.

Examples of reports that might be made include, but are not limited to, concerns relating to accounting and auditing irregularities, mispricing, insider trading and other market abuse, conflicts of interest, bribery and corruption, kickbacks, expense fraud and corporate entertainment in breach of BAC policy.

Individuals should consult with their Compliance Officer/Money Laundering Reporting Office ("MLRO") AND report the activity via [The Referral Management System](#) if the individual has valid reason to believe that potential financial crimes, including for example the reportable concerns noted above, either occurred, are occurring, or may occur.

Where individuals feel unable to raise an issue via The Referral Management System for any reason or prefer to report anonymously, the individual should contact the Ethics and Compliance Hotline (the "E&C Hotline") (click [here](#) for a list of country numbers) or submit a report to the E&C Hotline online at <https://www.tnwgrc.com/bankofamerica/> without the fear of retaliation such as dismissal, demotion, suspension, threats, harassment and any other adverse treatment in the context of employment. It should be noted that individuals who choose to remain anonymous will not ordinarily be able to receive feedback and that any action taken to look into a disclosure could be limited

Note that the process included herein should be read in conjunction with the Code.

Investigations of reports of workplace malpractice will be managed pursuant to the Internal Investigations Team's protocol and procedures, which includes protecting and keeping confidential the identities of any whistleblowers.

### **Independent Non-Executive Director Oversight**

BAMB has also designated an independent director in accordance with regulatory requirements who is responsible for the effective implementation of this process, including evaluating periodic reports that monitor and assess how concerns are escalated and dealt with, and overseeing reviews of the effectiveness of the process periodically.

The BAMB Board of Directors will receive periodic reports on substantiated whistleblower allegations.

### **Governance**

Country Compliance is responsible for ensuring all required notifications are made to the relevant regulators in relation to whistleblowing issues (having been advised on this by HR Legal).

The BAMB Board has the authority to approve the process and any subsequent significant changes.

This document was last updated on 26 June 2018.