WHISTLEBLOWING POLICY

Ouch Free Sdn. Bhd., or a holding company or a subsidiary, or a subsidiary of a common holding company (including any individual, group, partnership, or other entity) of Ouch Free Sdn. Bhd. ("Ouch", "we", "us", or "our"), are committed to maintaining the highest standards of integrity, transparency, accountability, and ethical conduct in all our business operations and professional activities.

Ouch has established this Whistleblowing Policy ("Policy") to provide a safe, confidential, and structured mechanism for employees, directors, vendors, business partners, customers, and members of the public to report genuine concerns regarding any improper conduct or illegal practices without fear of reprisal, harassment, or victimisation.

When you access our website or engage with our services, you are deemed to have read and understood the framework set out under this Policy.

OBJECTIVE AND APPLICABILITY

This Policy's primary objectives are to encourage the voluntary disclosure of genuine concerns regarding improper, unethical, or unlawful conduct within Ouch, to ensure that all disclosures are investigated objectively, confidentially, and in a timely manner, and to outline the protections granted to whistleblowers under the Whistleblower Protection Act 2010 ("WPA 2010") and relevant statutory requirements.

This Policy applies to all personnel within Ouch (including permanent, temporary, and contract employees, as well as directors and officers). It also extends to external parties, including customers, vendors, suppliers, corporate clients, contractors, and members of the public who have a business relationship with Ouch or observe improper conduct involving Ouch.

DISCLOSURE OF IMPROPER CONDUCT

An "Improper Conduct" refers to any act or omission which, if proven, constitutes a criminal offence, breach of civil law, violation of regulatory guidelines issued by Bank Negara Malaysia ("BNM"), or serious breach of Ouch's internal policies and ethics. Reportable instances include, but are not limited to:

- Financial malpractice, fraud, theft, embezzlement, or dishonesty;
- Corruption, bribery, or solicitation of illegal gratifications;
- Forgery or unauthorized alteration of company, customer, or partner insurer documents/records;
- Mis-selling, unethical sales practices, or misrepresentation of insurance/takaful products;
- Failure to comply with legal, regulatory, or BNM provisions and guidelines;
- Gross mismanagement, dereliction of duties, or abuse of power/position for personal gain;
- Severe conflict of interest without proper disclosure;
- Bullying, sexual harassment, or actions endangering health and safety;
- Profiteering as a result of inside knowledge or misuse of confidential information; and
- Deliberate concealment of any of the above instances.

This Policy is not designed for:

- **General Customer Complaints or Service Enquiries:** Issues regarding product features, policy servicing, premium processing, or general customer feedback should be directed to Ouch Customer Support (**support@ouch.my / +6019 399 7180**).
- **Personal Employment Grievances:** Internal employee disputes regarding performance reviews, salary adjustments, or standard workplace grievances should be handled through Ouch's internal Human Resource grievance procedures.

WHISTLEBLOWER PROTECTION

Ouch is committed to ensuring whistleblowers the full protection outlined under the WPA 2010 and BNM regulatory frameworks, provided the disclosure is made in good faith:

- The identity of the whistleblower, as well as all information disclosed, will be kept strictly confidential and restricted only to authorized personnel investigating the matter on a need-to-know basis.
- Whistleblowers acting in good faith will be protected from any form of reprisal, harassment, discrimination, victimization, suspension, dismissal, or adverse employment/business action.
- Whistleblowers shall not be subject to civil or criminal liability for making a disclosure in good faith under this Policy.

Note: If a situation arises where the whistleblower's identity must be disclosed by law or for court proceedings, Ouch will endeavor to inform and consult the whistleblower prior to disclosure.

RESPONSIBILITIES OF WHISTLEBLOWER

To ensure that the whistleblowing framework functions effectively and fairly for all parties, every whistleblower is expected to adhere to the following responsibilities:

- All disclosures must be made in good faith, without malice, bad faith, or ulterior motives.
- The whistleblower must reasonably believe that the information and allegations disclosed are substantially true and supported by factual evidence or reasonable grounds.
- Disclosures must not be made for personal gain, financial reward, or out of personal animosity/vendetta. If the reported matter involves or impacts the whistleblower's personal interest, this must be explicitly disclosed at the outset.
- The whistleblower must maintain strict confidentiality regarding the report and must not discuss, publish, or disclose the allegation, evidence, or investigation process to any unauthorized third parties or media outlets.

- The whistleblower must not attempt to personally investigate, contact, or confront the alleged wrongdoer, or demand restitution independently.
- Whistleblowers are expected to assist and cooperate fully with the designated investigating team by providing true details, facts, or necessary clarifications when requested.

EXCLUSION FROM PROTECTION

Potential whistleblowers are reminded that there may be instances wherein their protection would be revoked or excluded. Whistleblower protection may be excluded or revoked pursuant to Section 11 of the WPA 2010 if:

- The disclosure is found to be frivolous, vexatious, malicious, or made in bad faith;
- The disclosure is known or reasonably believed by the whistleblower to be false or untrue;
- The disclosure is made solely or substantially to avoid disciplinary action or dismissal;
- The whistleblower themselves participated in the reported improper conduct; or
- The disclosure breaches statutory laws specifically prohibiting disclosure (e.g., the Official Secrets Act 1972).

Making a false or malicious report is a serious offence that may result in disciplinary action (for employees) or legal recourse (for external parties).

HOW TO MAKE A DISCLOSURE

All disclosures of improper conduct must be submitted directly via email to our dedicated channel at **whistleblowing@ouch.my**.

To facilitate a prompt and thorough investigation, whistleblowers are encouraged to complete the **Whistleblowing Disclosure Form** here or provide written details containing:

- A clear description of the alleged improper conduct;
- Name(s) and designation(s) of the person(s) involved;

- Date, time, and location of the incident(s);
- Particulars of any witnesses; and
- Supporting documents or physical evidence, if available.

While whistleblowers may choose to remain anonymous, they are strongly encouraged to provide their contact details (email or telephone). This allows the investigating unit to seek necessary clarifications. Statutory whistleblower protection can only be fully extended when the whistleblower's identity is known to the designated authority.

HANDLING AND INVESTIGATION PROCEDURE

Upon receipt, Ouch will screen the disclosure to determine its validity and whether an investigation is warranted.

- If warranted, an independent investigation team will be assigned. The investigation will be conducted objectively, impartially, and in full compliance with Personal Data Protection Act 2010 guidelines.
- Where improper conduct is proven, appropriate corrective actions including but not limited to, internal disciplinary measures, contract terminations, or legal referral to BNM or the Malaysian Anti-Corruption Commission (MACC), will be enforced.
- Where feasible, the whistleblower will be updated on the status and outcome of the investigation.

OTHER DISCLOSURE CHANNELS & REGULATORY COMPLAINTS

Alternatively, the whistleblower may report directly to relevant government or regulatory authorities and enforcement agencies in Malaysia as prescribed by the WPA 2010 as per below:

- Bank Negara Malaysia:
  https://www.bnm.gov.my/whistleblowing-policy
- Securities Commission Malaysia:
  https://www.sc.com.my/investor-empowerment/lodge-a-complaint
- Malaysian Anti-Corruption Commission (MACC):
  https://portaladuan.sprm.gov.my/