



# **Etiqua Insurance Pte Ltd**

## **Code of Ethics and Conduct**

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You are required to return this COEC to Etiqa along with any other materials provided by Etiqa in the event if you are no longer with Etiqa.

## **Introduction**

### **Alignment to Maybank Group Code of Ethics and Conduct**

This Code is drawn up with reference to the Code of Ethics and Conduct Policy of the Maybank Group. Purpose of this code and the Maybank Code of Ethics and Conduct is to:

1. Uphold the good name of Etiqa and the Maybank Group and to maintain public confidence in Etiqa and the Maybank Group.
2. Maintain public confidence in the security and integrity of the Company.
3. Maintain an impartial and unbiased relationship between Etiqa, the Maybank Group and its customers.
4. Uphold the high standards of personal integrity and professionalism of Etiqa and Maybank Group staff.

#### **The Code of Ethics and Conduct stipulates that staff should not:**

1. Engage directly or indirectly in any business activity that competes or is in conflict with Etiqa's and/or the Maybank Group's interest.
2. Misuse or abuse their positions in the Company for their personal benefit or for the benefit of other persons.
3. Misuse information. Staff should not copy, remove or make use of any information obtained in the course of business for the direct or indirect benefit of themselves or of any other persons.

#### **In addition to these, staff should:**

1. Ensure the integrity and accuracy of records and/or transactions.
2. Ensure fair and equitable treatment in all business dealings on behalf of the Etiqa.
3. Maintain the highest standard of service in their relationship with customers.
4. Maintain confidentiality of all relations and dealings between Etiqa and its customers, unless sufficient and specific consent is provided by the customer to disclose his details.
5. Manage their financial matters well and not subject themselves to pecuniary embarrassment.
6. Observe and comply with laws and regulations relating to the operations of Etiqa and the Maybank Group.

## **Etiqa Code of Ethics and Conduct**

The Etiqa Code of Ethics and Conduct (the “COEC”) affirms the Company's commitment to ethical conduct and its practice of complying with all applicable laws and avoid potential or actual conflicts of interest.

Etiqa is committed to uphold the highest standards of business conduct, integrity and honesty. In serving our customers Etiqa’s good name and reputation is essential and we will do our utmost to protect it.

COEC is prepared to provide guidance to all directors and staff in our daily work conduct. It is not meant to be a compendium of all rules and Etiqa policies.

### **How is this COEC applicable?**

COEC applies to all directors, employees, representatives, business partners, contractors and anyone else when representing Etiqa in its duties.

There might be some provisions that may be waived in exceptional and limited circumstances. This is in case there are sufficient controls in place to address any potential conflict of interest. Staff will have to apply to the Company for such waiver, which is to be granted by the Senior Management on a case by case basis.

Any waiver for Chief Executive Officer and directors of Etiqa will be granted only upon approval by the Etiqa Board of Directors.

### **What if someone breaches this COEC?**

To protect Etiqa’s good name and reputation, the Company may carry out disciplinary action according to the severity of the breach, including the termination of its relationship or affiliation with any director, officer, staff, representative or supplier.

In the event that the breach also violates the Law of Singapore, one may also be subject to prosecution.

### **Where to go for help?**

In view that no one can anticipate every situation that will arise, it is important to have an approach for questions and concerns. Seek guidance from his/her supervisor, Human Resource Department, Compliance Department or Legal Counsel if he/she is unsure of what to do in any situation, for example in case of:

- having questions and/or doubts about a situation;
- having questions or concerns about a practice; or
- having questions or concerns over (potential) conflicts of interest.

If there are concerns about potential or suspected illegal, unprofessional, fraudulent or other unethical behaviour, one should be referred to the Head of Human Resources or Compliance Department. One should also report suspected or potential illegal or unethical behaviour without fear of retaliation. Etiqa does not permit and will not condone retaliation of any kind for good faith reports of illegal or unethical behaviour.

## **1. Conflict of Interest**

A conflict of interest arises when there is a divergence between a staff's personal interest and his or her professional obligations to Etiqa. Staff shall seek to avoid conflict of interest situations as it will be difficult for the Company to work and perform objectively and effectively. Even the appearance of a conflict may be harmful to Etiqa.

It is also deemed as a conflict if any activity affects one's judgment to act in the best interest of Etiqa's customers and other stakeholders. Staff of Etiqa, including Board of Directors, are expected to disclose any form of conflict of interest and comply with agreements and transactions entered into by Etiqa.

If a conflict of interest or a potential conflict arises, it should be reported immediately to the direct supervisor. In the event that it involves the direct supervisor, one should report directly to Compliance Department.

The following lists the types of activities where possible conflict of interest can occur:

### **a) Outside Financial Interest**

Where staff has a financial interest in a customer or vendor, whether as a sole proprietor, partner, shareholder, creditor or debtor, such an interest must be disclosed immediately to the staff's direct supervisor, who in turn should report to the CEO. Thereafter, staff should not be directly involved in the Company's dealings with the customer as long as the interest continues to exist.

The above restriction does not apply in cases where staff has holdings of a publicly quoted securities unless the Company considers the interest to be material, and the financial interest is considered likely to impair the objectivity of the staff concerned. In any case, holdings of five percentage or more of the voting shares of a public quoted company would be regarded as material.

When a conflict of interest arises between the Company and the customer or between the staff and the customer, and where such conflict is apparent, the customer should be made aware of the consequences that may arise.

In assigning duties, supervisors should not place their subordinates in situations where conflict of interest could arise.

### **b) Other Business Interest**

It is considered a conflict of interest if a staff conducts business other than the Company's business during working hours, unless prior approval has been obtained from senior management.

Where the acquisition of any business interest or participation in any business activity outside the Company and working hours demands excessive time and attention from the staff, thereby depriving the Company of the staff's best effort on the job, a conflict of interest also arise.

**c) Other Employment**

Before making any commitment, staff is to discuss with the Company possible part-time employment or other business activities outside the financial institution's working hours. The written approval of the Head, Human Capital or any other designated person should be obtained before the staff embarks on part-time employment or other business activities. Approval should be granted only where the interest of the Company will not be compromised and prejudiced.

Staff should devote his whole time and attention during working hours to his duties in the Company.

**d) Entertainment and Gifts**

Giving and receiving of gifts can affect or be seen to affect business judgement hence may give rise to conflict of interest. In such circumstances, staff is to strictly comply with the following principles when it comes to receiving or giving of gifts and receiving or giving of entertainment to/from any third parties, including but not limited to the Company's customers, suppliers / vendors or consultants.

Key principles are but not limited to:-

**(i) Prohibition on the soliciting or receiving of gifts**

- To prohibit all employees from soliciting, procuring or receiving directly or indirectly hampers, gifts, favours, preferential or concessionary offers, commission, emolument, gratuity, money, property, token or services, things of value, any facility or other intangible benefit from customers and any other party including suppliers, contractors and professional advisors whether for the employees' personal benefit or for the benefit of others.
- This prohibition also applies when employees are directly or indirectly involved in the organizing of annual dinners, sports events, family days and other events.
- In the event any gifts are received, employees may either (i) respectfully decline by informing and creating awareness of the Company's policy or (ii) in a situation where it is not possible or practically reasonable for employees to return, redirect, or otherwise decline gifts received, employees may choose to retain the gifts and disclosed to the Management. The Management has the discretion to decide on how to distribute or dispose of the gifts.

**(ii) Receiving gifts: festive season or local custom celebrations**

As it is customary to receive gifts during festive seasons, employees are allowed to receive hampers during these occasions provided:

- It does not place employees in a compromising position and the act of refusing the gifts would jeopardize customer relations.
- The gifts are not in the form of cash, bonds, negotiable securities, personal loans, guarantees, airline tickets, use of vacation property or other forms of security in which some benefits are derived. These are '**prohibited gift items**' and must be declined under any circumstances.

- Gifts received must be disclosed to the Management. The Management has the discretion to decide on how to distribute or dispose of the gifts.

**(iii) Receiving business entertainment and hospitality**

- Staff are not permitted to accept:-
  - a) cash and/or gifts with commercial value or lavish entertainment from customer; or
  - b) any form of benefit under a Will or Trust (including insurance policies) made by the customers where the gifts or benefits result from a relationship arising in the ordinary course of duties in the Company or as a result of services rendered by the staff as a representative of the Company. Staff should declare to their supervisors any gifts or favours from customers, counterparts or brokers.
- Staff may accept:-
  - a) any normal business entertainment that are not lavish or overly generous in nature as it may create a situation of conflict or potential conflict of interest;
  - b) any personal benefits arising from kinship marriage.
- Staff must immediately declare any gift or entertainment including lunches and festive hampers received from customers, associate and suppliers. Such declaration to be reviewed by their immediate supervisor.

<b>Declaration by</b>	<b>Reviewed by</b>
Management Team Members/Sector Head	Chief Executive Officer
Units Heads/Cluster Heads	Management Team Members/Sector Head
Rest of the staff	Unit Heads/Cluster Heads

- Staff must retain the duly approved “*Declaration of gifts and entertainment*” form in the office and make it available for review at any time.
- The Company has the right to ask the staff to surrender any gifts given to them by the customer. The Company also has the discretion to decide on how to handle or dispose of the gifts.
- With regards to official representation in industry or national councils, employees are allowed—upon declaration—to participate in officially organized activities, trips and events that are directly related to the objectives and terms of reference of the councils.

**(iv) Giving of corporate gifts and business entertainment (including hospitality treatments)**

The Company recognizes that gift giving and extension of entertainment or hospitality are means with which positive working relationships are created or maintained. Gifts and entertainment need to be extended openly, in good faith, non-conditional and not to secure unfair or improper gain. The following requirements apply:

- Gifts and entertainment must be seen to be normal, ethical, and appropriate to the expected or ongoing business relationships with recipients.
- Local laws and regulations and cultural norms must be taken into consideration when giving gifts or extending entertainment or hospitality treatments.

**e) Corporate Directorship**

Staff must not solicit corporate directorship. A staff should not serve as a director of another corporation without the approval of the Board of Directors. Staff who hold directorships without such approval must obtain approval immediately, if they wish to remain as director of other corporations.

However, staff may act as directors of non-profit Public Service Corporation, such as religious, educational, cultural, social, welfare, philanthropic or charitable institutions, subject to policy guidelines in the Company.

**f) Trusteeships**

Staff must not solicit corporate appointment as executors, administrators or trustees of customers' estates. If such an appointment is made and the staff is beneficiary of the estate, his signing authority for the estate's account must be approved by the Chief Executive Officer who will not unreasonably withhold approval.

**2. Misuse of Position**

2.1 Staff should not abuse their position in the Company to take advantage of any information obtained in the course of duty for personal benefit or for the benefits of other persons.

2.2 Staff should not make use of their position in the Company to solicit or receive favours from the Company's customer in exchange for granting them favourable underwriting or claim conditions.

2.3 Staff should not bribe customers when soliciting business. Corporate gifts offered or presented to customers on marketing trips, and gifts offered for deposits are not considered examples of bribes.

2.4 Staff should not solicit the following from customers or other parties:

- a) Favours,
- b) Preferential or concessionary offers; or
- c) Gifts or any form, including cash, bonds, negotiable securities, personal loans, airlines tickets, discounts or use of vacation or other entertainment facilities or property.



- 2.5 Staff should, whenever possible, discourage their customers and brokers from offering them personal gifts, favours or services.
- 2.6 Staff should not make use of their position in the Company:-
- (a) To solicit corporate directorships from the Company's customers, unless the member of the staff is appointed to the Board to represent the Company's interest; or
  - (b) To borrow from or become indebted to any customer.
- 2.7 It is the duty of all staff to ensure that no staff in the Company should misuse his or her position in the Company. Staff who know of any irregularities in the course of their work must report such irregularities in confidence to the Company.
- 2.8 Staff must not use the Company's name or facilities for personal advantage in political, investment or retail purchasing transaction, or in similar types of activities. Staff and their relatives, must not use their connections with the Company to borrow from or become indebted to customers or prospective customers. The use of position to obtain preferential treatment, such as in purchasing goods, shares and other securities, is prohibited.
- 2.9 Staff must not use the Company's facilities and influence for speculating in commodities, gold, silver, foreign exchange or securities, whether acting personally or on behalf of friends or relatives. Such misuse of position may be grounds for dismissal. Staff should also not provide mutually beneficial transactions to staff of other institutions in return for similar facilities, designed to circumvent the provisions contained in this Code.

Note:

*Under this clause, reference to "customers" wherever it appears also include reference to "distribution partners and vendors/suppliers of goods and services".*

### **3. Misuse of Information**

- 3.1 Staff should not copy, remove or make use of any information obtained in the course of business for the direct or indirect benefit of themselves or of any other persons.
- 3.2 It is regarded as a misuse of such information if staff uses information of the Company or customers to benefit themselves or confer an advantage on themselves or any other persons.
- 3.3 Staff in possession of confidential information should not use it in the following ways for the benefit of themselves or any other persons:-
- a) To influence any customer or any third party in dealing in any transaction; or
  - b) To communicate such information to any customer.

- 3.4 The above prohibitions relating to the misuse of information continue unconditionally after the staff ceases to be working for or being employed by the Company.
- 3.5 Staff in one division, department or branch should not retrieve or obtain information of the Company or customer from another division, department or branch unless the information so received is necessary in their normal course of work. Any transmission or transfer of information among the divisions, department or branches should be properly authorised.
- 3.6 Staff shall not deal in securities of any company listed or pending listing on a stock exchange at any time when he is in possession of information, obtained as a result of his employment by, or his connection with the Company which is not generally available to shareholders of that company and the public, and which, if it was so available, would likely bring about a material change in the market price of shares or other securities of the company concerned.
- 3.7 Staff who possesses insider information is also prohibited from influencing any other person to deal in the securities concerned or communicating such information to any other person, including other staff who do not require such information in the normal course of their duty.

#### **4. Integrity and Accuracy of Records / Transactions**

- 4.1 Staff should ensure that accurate and complete records of the Company's operations, dealings and transactions are kept and maintained in such a form and for such a period as determined by the Company.
- 4.2 Staff should never make entries or allow entries to be made for any account, record or document of the Company that are false or would obscure the true nature of the transactions as well as to mislead the true authorisation limits or approval by the relevant authority of such transactions.
- 4.3 Staff should ensure that any alteration or deletion to records are properly authorised by their superiors. Any removal of records must be properly documented.
- 4.4 Staff must ensure that Company's information and records are not copied by unauthorised persons including computer vendors.
- 4.5 Staff should report to their superior immediately upon discovery of any unauthorised copying, entries, deletions or alterations in the Company's records.
- 4.6 All records and computer files or programmes of the Company, including personnel files, financial statements and customer information, must be accessed and used only for the management-approved purposes for which they were originally intended.

## **5. Fair Competition - Fair and Equitable Treatment**

Etiqa is committed to fair competition in all its dealings with suppliers. It is important to communicate Etiqa's requirements clearly and uniformly to all potential suppliers and choose suppliers on the basis of merit, competitiveness, price, reliability and reputation.

No one is allowed to endorse a product or service using the Company name or his/her position in Etiqa. All queries and endorsements are to be handled by Marketing Department.

- 5.1 All business dealings on behalf of the Company with current and potential customers, with other members of the staff and with all those who may have cause to rely upon the Company, should be conducted fairly and equitably. Staff must not be influenced by friendship or association, either in meeting a customer's requirements or in recommending that they be met. Such decisions must be made on a strictly arm-length business basis. All preferential transactions with insiders or related interest should be avoided. If transacted, such dealings should be in full compliance with the law, judged on normal business criteria basis and fully documented and duly authorised by or on behalf of the Board of Directors or an independent party.
- 5.2 No member of staff shall offer any bribe or similar consideration to any person or company in order to obtain business for the Company. Any commissions paid or other payments made, or favourable terms conceded, or other advantages given, by any staff member in the conduct of the Company's business shall be in accordance with the Company's policies on such matters as notified from time to time and shall be promptly recorded in writing.

## **6. Relationship with Customers – related to cash handling**

- 6.1 Customers/Policyholders who entrust money to Etiqa expect it to be handled responsibly and with utmost care. And the staff assigned must make sure that the funds are handled in a trustworthy and correct manner.
- 6.2 For matters of abnormal or suspected abnormal nature such as fraud/defalcation, robbery/theft, cash discrepancy and loss of important document, the Head of Unit should immediately inform Head, Compliance giving all the information required. This is also applicable where staff isn't in the Company's own office premises (e.g. in a branch of a distribution partner). A written report must be sent to the Chief Executive Officer of the Company, and copy to Head, Human Capital.
- 6.3 For cash shortage and cash excess cases (Customer Service handling cash transactions), the Head of Unit should report to Head, Compliance, Chief Executive Officer of the Company, and copy to Human Capital and Audit.

## 7. Confidentiality

Confidential information includes personal data and all non-public information. These information might be useful to competitors or could be harmful to Etiqa if disclosed.

Etiqa does collect a substantial amount of confidential information on our applicants, policyholders and other stakeholders in its daily operation. Therefore, it is of utmost importance that Etiqa handles this information with the greatest care to protect privacy and confidentiality.

Under PDPA, all personal information collected must be protected, used only for the purpose for which it was collected, and destroyed when the purpose is no longer valid. With the consent of the applicant/policyholder, this information may be disclosed to those who have a right to this information or when the law requires disclosure, or otherwise in accordance with applicable Company privacy policies.

Information about the Company is confidential if it is not available to the public. And it must also be protected. Examples will be financial results before it being announced, business plans, strategic initiatives and current or proposed products. It is important not to discuss Company business in public places such as restaurants and washrooms, or when using public or cellular phones, the Internet and fax machines.

- 7.1 The confidentiality of relations and dealings between the Company and its customers is paramount in maintaining the Company's reputation. Staff is required to keep all information relating to the Company's customers confidential, including information regarding their accounts and transactions.
- 7.2 Staff should never remove or relocate documents or records of customers out of their divisions/departments/branches without the approval of their respective managers or department heads.
- 7.3 Staff has the duty to continue protecting the confidentiality of customer information even after cessation of employment with the Company and except with the Company's consent, staff shall not divulge or make use of any secret, copyrighted material or any correspondence, accounts or dealings of the Company or its customers. No staff shall in any way use information so obtained for any (inclusive financial) gain.
- 7.4 Upon cessation of their employment with the Company, staff must return to the Company, without demand, all documents or records in their possession for reasons of their employment with the Company and relating to the Company's customers, which belong to the Company or the Company's customer.
- 7.5 Staff should not reveal to third parties any names or other information in connection with any dealings or transactions with any customer.

## **8. Protecting Etiqa's Name and Reputation**

The Company's name must only be used for authorized Company business. Never the name, Etiqa, can be used for personal activities/gain.

Disparaging comments or false statements about the Company, staff and representatives, distribution partners, or its products and services can tarnish the Company's reputation. To protect Etiqa's reputation, staff is to refrain from making statements or badmouthing the Company in any statement, either written or oral, print, via electronic media or in person.

Each director and staff entrusted with access to or control over the Company's transactions and assets must ensure that each use, acquisition or disposition of an asset by a person on behalf of the Company is undertaken with the general or specific authorization from the Senior Management. It must also be accurately recorded in the Company's books of account and record.

All the creation, development or invention of intellectual property during the tenure of employment with Etiqa, which includes and is not limited to ideas, concepts, methods, processes, inventions and confidential information, is and will belong to and will be owned by Etiqa without prejudice.

Similarly, all documents, records, data, equipment and other physical property provided by Etiqa, or otherwise obtained or produced in connection with staff's employment with Etiqa, shall be or remains at all times the property of Etiqa. Staff is not allowed to remove or borrow Company property without permission from the direct supervisor or the Senior Management.

## **9. Making Public Statement**

9.1 For making public statements, the following designated positions are exempted from seeking written permission from the Company, if the act is in line with the discharge of official duties of the staff:-

- a) Chairman of the Board of Directors,
- b) Chief Executive Officer,
- c) Head, Marketing, and
- d) Any staff as such appointed by the Chief Executive Officer.

9.2 All staff shall not, during or after termination of his employment with the Company:-

- a) Publish or cause to be published or circulate any articles, statements, books, photographs or letters; or
- b) Give away any interview or broadcast or deliver any lectures or speeches on any matter, which concerns his duties or the policies, decisions or the business of the Company or any matter connected with the Company without obtaining the prior written consent of the Company.

9.3 If any permission is granted in accordance with clause 9.2, it shall be subject to the condition that:-

- a) The proposed publication shall not be published as may reasonably be implied that it had received official support or backing or sponsorship from the Company; or
- b) The proposed publication shall not bear the words “approved publication” or words to that effect.

9.4 Staff wishing to seek permission to publish or write a book or article based on official information must write to the Head, Human Capital or any other designated persons, giving details of the proposed book or article.

## **10. Social Media Usage**

When using social media such as, but not limited to, personal blogs, Facebook or twitter, staff is to be mindful not to disclose any confidential information about the Company's business, its customers and all other matters related to the Company. Staff is not authorised to make any commentaries on behalf of the Company and especially such that (potentially) would affect the image and reputation of the Company adversely. Staff is prohibited from using/editing the Company's logos, any pictorial images related to the Company and trademarks in their personal (social media) accounts. Furthermore, Staff is required to comply with Company's Usage Policy for Information Systems.

## **11. Use of Office Computers and Other Communication Equipment**

The Company's communication equipment and systems are meant for Etiqa's business only. This includes all computers and telecommunications equipment, as well as all remote computing services, including the Internet.

Staff is to note that all emails and voice mail systems (including data on these systems), Internet access and computers are Etiqa's property. IT staff or authorized individuals are required to check these systems periodically to rectify any network problems and to ensure they are secured.

Staff are required to comply with Company's Usage Policy for Information Systems.

## **12. Copyright Materials**

Copyright laws protect materials staff and representatives use in the course of their daily work. This includes computer software, training slides and materials, management models and problem-solving frameworks, sometimes produced by third parties. It is important to note that it is illegal to reproduce, distribute or edit copyrighted material without the permission of the copyright owner or his authorized agent.

### **13. Keeping Records**

All Etiqa's books, financial reports, expense accounts, administrative records etc. must be completed accurately, honestly and in accordance with the Company's procedures. Any false, fictitious or misleading entries with respect to any transaction of the Company are prohibited. No director, staff and other stakeholders should engage in any transaction that requires or contemplates the making of false or misleading entries.

### **14. Required Knowledge and Compliance**

14.1 Staff, particularly at the senior level, should keep up-to-date with applicable laws, rules and regulations in their respective area of operations and assure Etiqa complies with the same.

14.2 Management is required to take reasonable steps to ensure that their subordinates are kept informed of and are familiar with all applicable laws or regulations relevant to their respective operations. They should up-date their subordinates on any change in such laws or regulations and assure Etiqa complies with the same.

14.3 Staff that is not familiar with the law and regulations applicable to their area of operations should seek guidance from their direct superior. The supervisor should take the necessary steps to assure compliance with the applicable law and regulations.

### **15. Pecuniary Embarrassment**

15.1 Staff are expected to manage their financial matters well. The Company takes a very serious view of such "pecuniary embarrassment" i.e. the state of one's indebtedness.

15.2 Staff is deemed to be in state of pecuniary embarrassment:-

- a) Where he is a judgement debtor, for as long as the judgement debt remains unsettled and a stay of execution has not been granted;
- b) Where he is a bankrupt or an insolvent wage earner, for as long as he remains as a not discharged bankrupt or for as long as any judgement against him in favour of the official assignee remains unsatisfied and a stay of execution has not been granted;
- c) Any such behaviour not deemed fit from ethical or prudent perspective for staff of a financial services company, e.g. gambling.

### **16. Avenue to Express Viewpoint or Complaint**

Staff may express their viewpoint or complaint on any matter or person with the Company's interest at heart directly to the Head, Human Capital or any designated person in writing.

## **17. Local Laws and Regulations**

- 17.1 Notwithstanding the fact that Etiqa is to follow its corporate standards of ethical business conduct, Etiqa will also ensure that it is in compliance with local applicable law, and regulations.
- 17.2 Staff is expected to have an understanding and works within the spirit of the law and regulations that Etiqa is working within and how they will affect his work. It is the responsibility of the staff to seek clarification / guidance before a (potential) violation takes place. Any violations are required to be reported to Compliance Department and how they are to be managed properly.

## **18. Sexual Harrassment**

Sexual harassment means any unwanted or unwelcome verbal, non-verbal or physical sexual advances, requests for sexual favours or other verbal or physical conduct of a sexual nature when;

- a) the conduct interferes with another person's work or creates an intimidating, hostile or offensive working environment; or
- b) having regard to all circumstances a reasonable person would have anticipated that a recipient would be offended, humiliated or intimidated; or
- c) submission to or rejection of the conduct might be used as a basis for decisions affecting a person's work or promotion prospects; or
- d) submission to or rejection of the conduct might, on reasonable grounds, be perceived by the recipient as an offence or humiliation, or a threat to the employee well being, but has no direct link to the employee's employment.
- e) the conduct is based on the gender or sexuality of the recipient.

Within the context of this Code, sexual harassment in the workplace includes any employment related sexual harassment occurring outside the workplace as a result of employment responsibilities or employment relationships. Situations under which such employment related sexual harassment may take place include, but are not limited to, sexual harassment:-

- a) work related social functions, conferences or training sessions;
- b) in the course of work assignments outside the workplace;
- c) during work related travel;
- d) over the phone; and
- e) through electronic media



**Notes**

*The guidelines are meant to serve as a guide for the promotion of proper standards of conduct and sound prudent practices in business. Such Code of Ethics and Conduct should not, however, restrict or replace the mature judgement of any staff in conducting their day-to-day activities. It is also not to replace any existing rules and regulations of the Company.*

*In the event of doubt, relating to the Code of Ethics and Conduct; staff are to seek guidance from their respective Manager or Head of Department, who may, if necessary seek guidance from Senior Management.*

**STAFF ACKNOWLEDGEMENT**

I acknowledge that I have received and read the Etiqa Insurance Pte. Ltd. Code of Conduct and understand:-

My obligation as an employee to comply with the principles, policies and laws outlined in the Code of Conduct, including any amendments made by the Company;

That any breach of the Code of Coduct may result in disciplinary action which includes but is not limited to, making good loss sustained by the Company, termination or services or dismissal and civil proceedings;

That a current copy (including any subsequent amendments) of the Code of Conduct is available in either the common drive which is accessible to all or the company's intranet.

Signature : \_\_\_\_\_  
Name : \_\_\_\_\_  
Designation : \_\_\_\_\_  
Sector/Unit : \_\_\_\_\_  
Date : \_\_\_\_\_