



TOKIO MARINE  
INSURANCE GROUP

# Whistleblowing Policy

Tokio Marine Life Insurance Singapore Pte. Ltd.

*& its subsidiary*

Tokio Marine Financial Advisers (Singapore) Private  
Limited (TMFAS)

Version 10.0  
Effective 24 April 2026



## 1. Introduction

### 1.1 Purpose

Tokio Marine Life Insurance Singapore Pte. Ltd. (TMLS) and its subsidiary Tokio Marine Financial Advisers (Singapore) Private Limited (TMFAS) operate a Whistleblowing system to provide a channel for employees and other stakeholders, including contractors, agents, advisers, business partners and members of the public to report concerns related to suspected Improprieties as defined below. Employees are encouraged to report concerns without fear of retaliation in accordance with applicable Company policies. For non-employees, reports will be handled in good faith, and the Company does not tolerate retaliation to the extent such retaliation is within its control or influence.

This Policy sets out the framework under which reports may be made and handled. It does not create any contractual, legal or equitable rights in favour of any whistleblower or other person.

### 1.2 Commitment

The Whistleblowing system is overseen independently by TMLS Audit Committee (AC) and adopts a zero-tolerance approach to retaliation against whistleblowers. TMLS and TMFAS are committed to fostering a culture of openness, accountability and integrity. The Whistleblowing system provides a discreet and confidential channel for reporting concerns.

All whistleblowing reports received under this Policy will be assessed by the Head of Internal Audit Department (IAD). Where appropriate, further investigation may be undertaken as determined by the AC and/or the Board of Directors.

All concerns raised will be handled in a confidential manner to the extent reasonably practicable, unless disclosure is required or appropriate for the purposes of investigation, legal advice, compliance with legal or regulatory obligations, engagement with regulators or law enforcement agencies, or within the Tokio Marine Group on a need to know basis.

### 1.3 Nature of Policy and No Guarantee

This Policy is intended to facilitate the reporting and assessment of suspected Improprieties and does not constitute a contract, promise, representation or guarantee of any particular outcome.

TMLS and TMFAS reserve the right, at their sole discretion, to determine whether and how any report will be assessed or investigated, including the scope, process and resources applied, taking into consideration applicable laws and regulatory obligations.

While TMLS and TMFAS may acknowledge receipt of a report, the Company is generally not obliged to disclose investigation processes, findings or outcomes to whistleblowers, particularly where confidentiality, legal privilege or regulatory considerations apply.

## 2. Definition of Improprieties

For the purposes of this policy, Improprieties include suspected or actual illegal, false, misleading, dishonest, deceptive, unethical, and corrupt conduct that is reasonably connected to or impacts the business, operations or activities of TMLS and/or TMFAS.

Some examples include but are not limited to the following:

- All forms of financial malpractices or improprieties such as fraud, corruption, bribery or theft. Examples include forging customer's signature, misappropriating company or client's funds.
- Any criminal offense or wilful act.
- Failure to comply with legal or regulatory obligation such as negligence and breaches of Acts.
- Breaches of or failure to comply with company policies & procedures. Examples include disclosing company confidential information to competitors or media with the intention of making use of company proprietary information for profit making activities.
- Any act of physical violence or emotional abuse within the workplace.
- Any instances of sexual harassment or discrimination of other kinds.
- Concealment of any or a combination of the above.

The following matters fall outside the scope of this Policy and will generally not be investigated under the whistleblowing framework:

- customer service complaints or dissatisfaction with products or services
- Commercial contractual or pricing disputes
- operational issues or matters better addressed through normal business channels
- employee personal grievances relating to wages, benefits, performance management, workplace conflict and working conditions and
- Matters that are the subject of ongoing or contemplated legal proceedings

## 3. How to Make a Report

Whistleblowers are encouraged to provide the following information to enable the effective investigation of your concerns:

- (i) Name and contact detail
- (ii) Identity and particulars of parties involved
- (iii) Date, time and place of improprieties
- (iv) Reason(s) for the concern
- (v) Any other relevant information or supporting evidence that would assist in evaluating the reportable concerns

The ability to investigate depends on the quality and adequacy of information provided by whistleblowers.



Whistleblowers may choose to report anonymously where the reporting channel permits. However, anonymity may limit the Company's ability to investigate the report and may not be fully preserved in certain circumstances, including where identity becomes apparent during investigations or disclosure is required by law.

Reports must be made in good faith and based on reasonable grounds. Employees who knowingly make false or malicious reports may be subject to disciplinary or other legal action in accordance with applicable Company policies. Where reports are made by non-employees, TMLS and TMFAS reserve all legal rights in respect of knowingly false, frivolous, vexatious or malicious allegations.

Whistleblowers may use any of the following hotlines and website to submit your report:

**TMLS Head of IAD Hotline**

Direct line: +65 6592 5702 (Head of IAD)

Dedicated email: [whistleblow@tokiomarine-life.sg](mailto:whistleblow@tokiomarine-life.sg)

**TMLS Board Audit Committee Hotline**

c/o Chairman of Audit Committee

Email: [LiLi.Kuan@tokiomarine-life.sg](mailto:LiLi.Kuan@tokiomarine-life.sg)

**Tokio Marine Asia Hotline**

c/o Compliance Officer

Tokio Marine Asia Pte Ltd

Legal & Compliance, Corporate Secretariat

20 McCallum Street

#13-01 Tokio Marine Centre

Singapore 069046

Direct line: +65 6592 6002

General line: +65 6372 2988

Email: [compliance@tokiomarineasia.com](mailto:compliance@tokiomarineasia.com) (English only)

#### **Main channel - TMHD Global Hotline**

URL: <https://whistle.jp/tokiomarine/>

Log-in password: tokio

- This hotline is managed by “TSUHO Support Centre” with effective date as of 1 Apr 2020.
- There are 18 languages for this hotline, namely: English, Japanese, Chinese, Korean, Filipino, Vietnamese, Thai, Malay, Indonesian, Myanmar, Hindi, Arabic, German, French, Italian, Spanish, Portuguese, and Russian. Whistleblowers can elect to conceal their contact information.
- Two-way communication can be done anonymously, except with Russian.
- It will apply local law restrictions on cross-border transfers of information.

#### **4. Data Protection**

Personal data provided under this Policy will be collected, used and disclosed for the purposes of assessing, investigating and responding to whistleblowing reports, in accordance with applicable data protection laws, including the Singapore Personal Data Protection Act 2012. Where reporting channels involve cross-border transmission of information, appropriate safeguards will be applied in accordance with applicable legal and internal requirements.

#### **5. Reservation of Rights**

TMLS and TMFAS reserve all rights to take appropriate action in response to any report, including declining to investigate, referring matters to regulators or law enforcement agencies, or pursuing legal remedies where warranted.