

Whistle Blowing Policy Care Corner Seniors Services Ltd

Purpose & Scope

Our charity organisation is committed to high standards of corporate governance and compliance with all laws and regulatory requirements. Malpractice, impropriety or statutory non-compliance by our board members, management, staff or volunteers in the course of their work shall not be condoned by the organisation.

Our Whistle-blowing Policy provides an avenue to raise in confidence and without fear of retaliation or unfair treatment, any concerns that may include issues of: corruption, acts of fraud, cheating, theft, misuse of the organisation's properties, assets or resources, breach of laws, misconduct or inappropriate behaviour, etc. that may be suspected. This is to assist the organisation in managing such allegations, ensuring that disciplinary and civil actions which are initiated (where necessary) following the completion of the investigations are appropriate and fair, and ensure that actions taken to correct any weakness in the existing system of internal processes which allowed the perpetration of the fraud and/or misconduct are effective to prevent recurrence.

Protection

The organisation shall not tolerate the harassment or victimisation of anyone reporting a genuine concern. No person should suffer reprisal as a result of reporting a genuine concern, even if the concern reported is later proven to be a mistaken allegation. However, this assurance does not extend to any person who intentionally provides information in a report which they know or reasonably believe to be untrue.

Acting in Good Faith

Anyone filing a verbal or written complaint concerning a violation or suspected violation (i.e. the concern in question) must be acting in good faith and have reasonable grounds for believing that the information disclosed indicates a violation. Any allegations that prove not to be substantiated and/or which prove to have been made maliciously or knowingly to be false shall be viewed as a serious violation of good faith and appropriate action may be taken against the individual who has made the allegation.

Process

- a. Both verbal and written submissions by the whistle-blower shall be accepted for consideration and review. In either case, the whistle-blower is required to make his/her identity known to the Receiver of the complaint, when filing the complaint concerning the violation or suspected violation.
- b. A 'verbal' complaint is defined as a complaint or concern made (i.e. filed) through a face-to-face meeting with the Receiver of the complaint/concern. It does not include concerns made through a telephone call or call via any other electronic devices in which the person's identity cannot be identified by the receiver.
- c. The Receiver could be one of the following:
 - i. The Compliance Officer
This is a person who has been appointed by the Audit & Risk Committee to support the Committee's role in this whistle blowing policy.
 - ii. The Audit & Risk Committee
This Committee which has been appointed by the Board to look into audit and risk matters of the organisation, is responsible for handling all reported cases and ensuring that issues raised are properly resolved by the Board, management and/or appropriate parties concerned.
 - iii. The Board Chairman
That is, the appointed Chairman of the Board.
- d. Where the Compliance Officer is the Receiver, the Compliance Officer shall on behalf of the Audit & Risk Committee notify the whistle-blower and acknowledge receipt of his/her reported violation or suspected violation.
- e. For verbal filing of complaints/concerns (i.e. following Point (b) above), the whistle-blower is required to make an appointment for a face-to-face meeting with one or more members of the Audit & Risk

Committee together with the appointed Compliance Officer who shall record his/her statement. The whistle-blower is required to sign-off on his/her statement that is recorded at the point of the meeting.

- f. If the reported violation involves the Compliance Officer, the Audit & Risk Committee or any of the Audit & Risk Committee members, the whistle-blower may report his/her concern through a written or verbal means directly to the Board Chairman via the channel shown in Point (g)(ii) below.

For a verbal report in such an instance, the whistle-blower shall make an appointment with the Board Chairman for the Board Chairman and one other board member, or for two board members (if the Board Chairman is not available to act as one of the representatives) for the whistle-blower's statement to be recorded and signed. (The board members mentioned here should have no involvement with the Audit & Risk Committee.)

However, if the Board Chairman has deemed that the reported concern bears no relation to the Compliance Officer, the Audit & Risk Committee or any of its committee members, the Board Chairman may refer the reported concern back to the Audit & Risk Committee for follow-up.

- g. The channels for reporting a concern shall be as follows:
 - i. **Whistle-blowing reporting and communication channels to the Audit & Risk Committee (via the Compliance Office)**

Email	whistleblow@carecorner.org.sg
Mail	The Audit & Risk Committee Care Corner Seniors Services Ltd c/o 8 New Industrial Road #06-03 LHK3 Building Singapore 536200
Telephone	(65) 6250 6813 ext 3

- ii. **Whistle-blowing reporting and communication channels made directly to the Board Chairman - for matters concerning the Audit & Risk Committee, its members or the Compliance Officer**

Email	whistleblow-sschairman@carecorner.org.sg
Mail	The Board Chairman Care Corner Seniors Services Ltd Blk 62B Lorong 4 Toa Payoh #02-121 Singapore 312062
Telephone	(65) 6258 6601

Confidentiality

- a. The whistle-blower must be prepared to make his/her identity known to the receiver of the complaint/concern.
- b. The identity of the whistle-blower is to be treated with the strictest confidence at all times.
- c. Reports of violations or suspected violations shall be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.
- d. Notwithstanding Point (b) above, the organisation reserves the right to release the identity of the whistle-blower, should this be a requirement by law or if for identified reasons for doing so, significantly

helps in the investigation process. In such cases, the whistle-blower shall be informed in advance and the reasons made clear to him/her. If the whistle-blower wishes to retain his/her confidential status he/she has the option to withdraw the report to protect his/her confidential status.

Investigation and Outcome Report

- a. All concerns raised shall be promptly and independently assessed by the Audit & Risk Committee to ensure that they are fairly and properly considered.
- b. The Audit & Risk Committee shall conduct a prima facie investigation of all complains to determine if further investigation is justifiable and required.
- c. The whistle-blower shall also be kept informed on the outcome of the investigation.
- d. The Audit & Risk Committee shall determine at its discretion, if the whistle-blowing instance is deemed sufficiently significant to be reported to the Board.
- e. If the reported violation is in relation to and involves the Compliance Officer or the Audit & Risk Committee, the Board Chairman or a board member of whom the Board Chairman has appointed for the role and who has no involvement with the Audit & Risk Committee shall assume the investigative role of the Audit & Risk Committee as stated in Points (a) to (d) above.

Modification

The organisation may modify this Policy to maintain compliance with applicable laws and regulations or accommodate changes within the organisation.