

## 5. WHISTLE-BLOWING POLICY

### 5.1 General Scope of Policy

This policy applies to all JRBBTC employees and the parties as stated below:

- e) Committee Members / Town Councillors
- f) JRBBTC Management Team
- g) JRBBTC Staff
- h) Other parties acting on behalf of JRBBTC such as service providers

JRBBTC aims to instil an ethical and socially responsible workplace and this policy:

- a) encourages any employee to come forward and report instances of improper conduct
- b) protects the individual who reports such incidents, whether actual or suspected but in good faith, from any form of retribution
- c) ensures that all reports are thoroughly and promptly investigated, and that corrective or disciplinary action taken

### 5.2 Definitions

An allegation of misconduct means conduct, which, in the view of the reporting individual acting in good faith, is:

- dishonest
- fraudulent
- corrupt
- illegal
- a violation of any law, rule, or regulation of Singapore

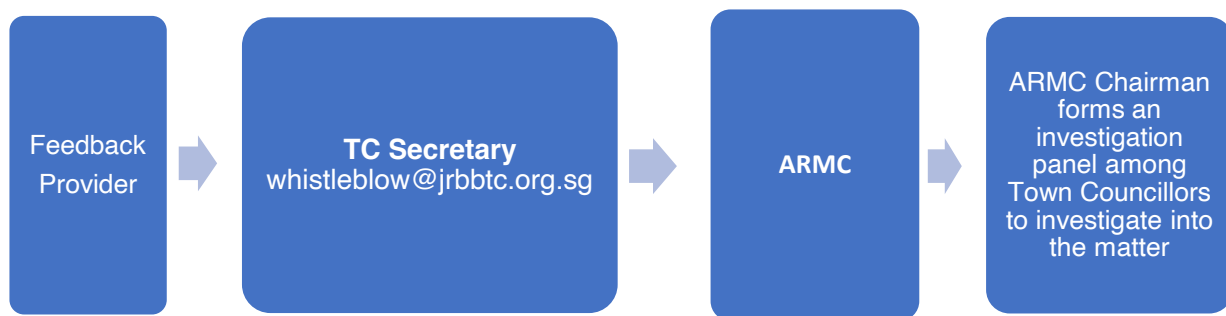
Acting in good faith means acting on an honest belief when giving an honest, sincere, and complete report. Simply stated, it does not matter whether the belief that a breach may have occurred was mistaken.

A whistle-blower refers to any person who reports an allegation of misconduct by any JRBBTC employee and the parties in Page 3.

### 5.3 Reporting Procedures

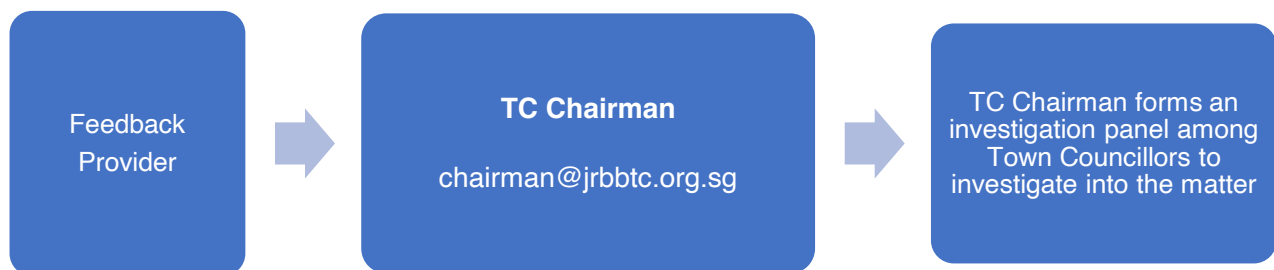
#### Situation A:

If the report is against TC Chairman, the whistle-blower can report the matter to the TC Secretary directly. Please refer to the attached flow chart for the reporting procedure.



#### Situation B:

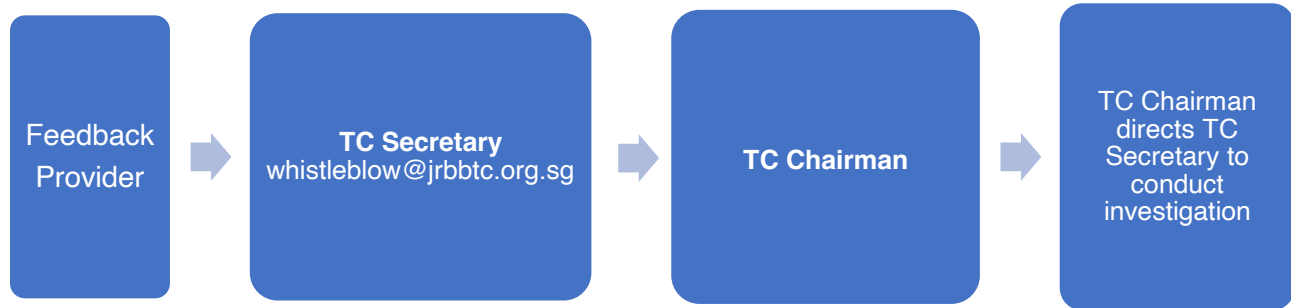
If the report is against the Town Councillors/ TC Secretary, the whistle-blower can report the matter to the TC Chairman directly. Please refer to the attached flow chart for the reporting procedure.



#### Situation C:

If the report is against staff/ contractor/ service providers other than the TC Secretary, the whistle-blower can report the incident directly to the TC Secretary. Please refer to the attached flow chart for the reporting procedure.

## CODE OF CONDUCT



### Investigation Procedures

- The investigation panel may comprise officers and/or Town Councillors.
- The investigation panel shall review all the evidence, interview with the suspect(s) and witness(es) during the investigation process.
- The interviews with suspect(s) and witness(es) shall be recorded and minuted.
- After the investigation is completed, the lead investigation officer shall compile a report with all evidence and interview minutes and submit it to the TC Chairman for review.

The TC Chairman shall review and evaluate the report with all evidence and determine if

- A fresh investigation shall be conducted again by a fresh team of investigators,
- Request that further investigation be conducted by the same investigation team,
- Choose to conduct his own investigation if required or
- Conclude and close off the investigation.

Where necessary, JRBBTC shall consult and seek legal advice. For criminal offences and corruption cases, the matter may be referred to the Singapore Police Force (“SPF”), Criminal Affairs Department (“CAD”) and/or Corrupt Practices Investigation Bureau (“CPIB”).

If any improper/ inappropriate practice and misconduct is proven, the TC Chairman shall decide on the appropriate course of action to be taken that includes

- Reprimand and/or take disciplinary action,
- Transfer employee to another department or office,
- Termination or suspension of employment or contract with any third-party vendors and report the matter to relevant authorities and/or
- Any other action deemed appropriate by the Town Council

The TC Chairman shall then communicate the result and the course of actions taken in writing to the suspect.

The TC Chairman shall communicate to the whistle-blower in writing on the corrective actions to be taken in the future and the action taken against the alleged.

### **5.4 Submission of Hard Copy Report(s)**

For reports made via hardcopy, the whistle-blower shall submit the written report in a sealed envelope marked "Private & Confidential" and mail it Block 255 Jurong East Street 24, #01-303, Singapore 600255.

The sealed report shall be sent to the Risk and Compliance Department and should include the following information to facilitate the investigation (but not limited to):

1. Name and contact details (e.g., address, email or phone number) of the
2. whistle-blower
3. Time and date of the alleged act that took place.
4. Clear description of the alleged act.
5. Documentary/ audio/ visual evidence proof, if any.

### **5.5 Appointment and Composition of the Investigation Panel**

The TC Chairman shall have the authority to appoint the investigation panel.

The appointment of the investigation panel shall be decided by the TC Chairman.

The investigation panel shall comprise members based on the following factors:

- Able to maintain independence and confidentiality of the investigation,
- Subject matter expert of the alleged act committed,
- Display high levels of integrity and
- Able to take an impartial view on the matter.

The size of the working committee shall be up to the discretion of the TC Chairman.

The TC Chairman shall notify the investigation team in writing to inform them of their role in investigating the allegations made by the whistle-blower.

### **5.6 Contents of the Investigation Report**

The content of the investigation report shall be documented by the investigation panel and submitted to the TC Chairman for review.

The information of the investigation report shall contain

- Details of the incident,
- Investigation procedures taken,
- Outcome of the investigation and justification and
- Recommendations to the relevant department to take preventive measures to minimise and/ or prevent future recurrence

### **5.6 Confidentiality**

The whistle-blower's identity will always be treated confidential unless disclosure is required by law. All documents, files, reports, communications relating to the incident reported by the whistle-blower shall be kept confidential and securely stored and retained by the TC Chairman for Situation A and by the TC Secretary for Situation B.

### **5.7 Protection for Whistle-Blower**

JRBBTC will take all reasonable measures to ensure that a whistle-blower who reports an allegation of misconduct in good faith, and any person who participates in the investigation into the alleged misconduct, will be protected from any form of retaliation or retribution by the Management of the Town Council, including but not limited to:

- Dismissal,
- Demotion,
- Any form of harassment,
- Discrimination, or
- Any form of biasness.

### **5.8 False Reporting**

Any staff, who intentionally made a false report or making a report other than in good faith, will be considered as misconduct, and may lead to disciplinary action, including termination of employment in serious cases.

### **5.9 Record Keeping**

The TC Secretary will maintain a record of all cases reported by whistle-blowers and the investigation reports for a period of 5 years.