SASCO Senior Citizens' Home	Whistle-blowing Policy	**Policy Number:**	POL_EO_WB
		Policy Owner :	Executive Office
		Effective Date:	Nov 2021
		Last Revised:	Feb 2026

Reference:
https://www.charities.gov.sg/PublishingImages/Resource-and-Training/Guides-Templates-Awards/Guides/Documents/Whistle%20Blowing%20Policy%20and%20Procedures_IIA%20(Sep%202017).pdf

Introduction

In April 2017, a revised Code of Governance for Charities and Institutions of a Public Character (the "Code") was released by the Charity Council. Under the revised Code, Singapore charities in the enhanced tier and Institutions of a Public Character (IPCs) in the enhanced and the advanced tier[1] (hereinafter referred to as the charities) should disclose in their annual reports whether they have a whistle-blowing policy for financial years beginning on or after 1st January 2018.

[1]Charities in the enhanced tier: Gross annual receipts or a total expenditure of S$10 million or more.
IPCs in the enhanced tier: Gross annual income or total expenditure of S$500,000 and up to S$10 million. IPCs in the advanced tier: Gross annual income or total expenditure of S$10 million or more.

1. Purpose

This Policy aims to encourage employees and other stakeholders to report concerns on misconduct or malpractice (i.e., improper, illegal, or negligent behaviour) in good faith, without malice or personal benefit. Without the fear of reprisal, discrimination, or adverse consequences, it enables SASCO Senior Citizens' Home (SASCO Home) to take timely and appropriate actions for any allegations, thereby propagating a culture of probity, respect and transparency.

2. Scope

The BOARD of Directors (BOARD) of SASCO Home articulates its direction and intent on whistle-blowing through its whistle-blowing policy, and with reference from the whistle-blowing policy of SASCO Limited[2]. It is designed to provide a clear tone of commitment to employees and other stakeholders that whistle-blowing concerns are important to sound governance and that they are taken seriously by SASCO Home. They are encouraged to raise their concerns with an assurance of confidentiality and protection in the policy. It articulates how the whistle-blowing process manages concerns from the initiation of the concern to the closure of the case.

[2] SASCO Limited being the parent-body of SASCO Senior Citizens' Home, with its Committee of Management (COM) responsible for its whistle-blowing policy, and vis-à-vis the relationship structure between SASCO Ltd and SASCO Home.

The policy includes a framework of accountability and responsibility, competency, monitoring and review to ensure the design and operational effectiveness of the whistle-blowing processes and practices in SASCO Home. This policy is designed to enable employees and other relevant stakeholders to report any alleged concerns in good faith on misconduct or malpractice.

3. Policy Objectives

To whistle-blow is to report concerns by employees or other stakeholders in good faith on misconduct or malpractice that may be detrimental to SASCO Home and/or public interest. Whistle-blowing is an essential part of sound governance.

The policy addresses the BOARD's commitment to proper ethical behaviour where employees and other stakeholders are encouraged to report concerns without fear of reprisal or unfair treatment.

The objectives of the policy are:
- To provide a formal process to raise and handle whistle-blowing concerns and a framework to support the process.
- To encourage employees and other stakeholders to report improper, unethical, and inappropriate behaviour.
- To provide assurance that all reports will be properly addressed, treated with confidentiality and there are adequate whistle-blower safeguards from reprisal in any form.
- To promote and develop a culture of accountability, integrity, and transparency.

4. Roles & responsibilities

BOARD oversees whistle-blowing practices in SASCO Home, and reports to the Committee of Management (COM) of SASCO Limited. This oversight responsibility requires the establishment of a whistle-blowing policy that is relevant to the context of SASCO Home.

The COM (and BOARD) is usually assisted by a staff in charge (Executive Office) of the whistle-blowing process who ensures that the procedures are carried out in accordance with the policy.

In essence, there are many stakeholders involved in the whistle-blowing process. These include the COM, the BOARD, whistle-blower, alleged party, staff receiving the report, investigator, Whistle-blowing Governance Officer (Head, Executive Office).

5. Confidentiality & Protection

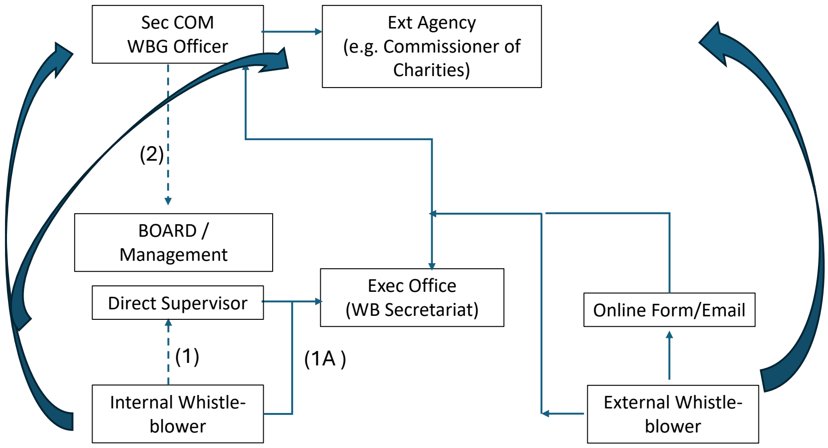
SASCO Home respects the confidentiality of the whistle-blower and is committed to preserving confidentiality by keeping the report and case information secure and accessible only to designated persons. Aligned with the spirit of confidentiality, SASCO Home may act on anonymous reports although it is encouraged otherwise, in view of the seriouseness of the action to whistle-blow.

Confidentiality has two sides. Concurrently, the Whistle-blowing Governance Officer should ensure proper confidentiality safeguards of the filed report, while maintaining the confidentiality of those involved in the case. If necessary or lawful circumstances dictate the disclosure of the whistle-blower's identity, SASCO Home must seek the whistle-blower's consent.

SASCO Home does not condone any reprisal, discrimination or harassment against whistle-blowers who report in good faith. It is committed to protecting whistle-blowers from threats to employment and any other threats of retaliatory action. Disciplinary actions will be taken against those who retaliate, harass, or discriminate against whistle-blowers.

6. Whistle-blowing process

To raise whistle-blowing concerns – internal and external reporting channels. The internal whistle-blower (e.g., employee) can report direct to the Whistle-blowing Governance Officer (Secretary, COM, SASCO Ltd), via email or verbal. Under other circumstances, it may be via his/her direct supervisor, using the internal channels (e.g., reporting hotline, mail, or online form). The internal whistle-blower may also report directly to an external agency (e.g., Office of the Commissioner of Charities). Depending on the severity of the alleged concern (e.g., when the concern involves a criminal offence), SASCO Home can refer the matter to the relevant external agency. On the other hand, the external whistle-blower can raise the concern either through the internal and/or external channels.

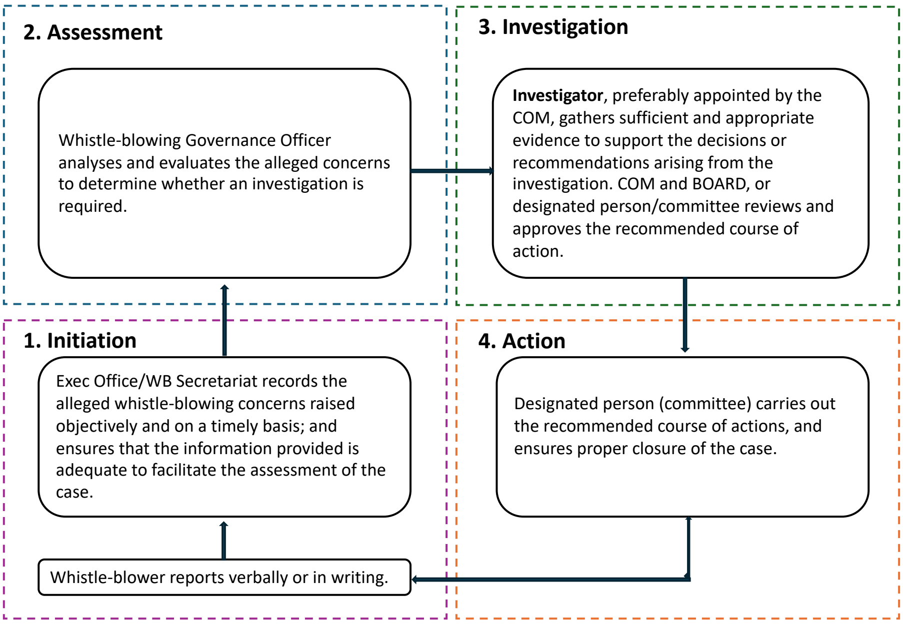


1. Staff is unsure and requires assistance of Supervisor to submit to WBG Officer.
1A. E.g. by hand
2.. WBG may want to keep BOARD/management in the loop.

Ways to Raise Concerns for Employees and Other Stakeholders

1. Initiation (i.e., raising of the concern).
2. Assessment of the concern.
3. Investigation to substantiate the concern; and
4. Measures to ensure that the recommended course of action is carried out, including proper follow-up, notification of the outcome to the whistle-blower for non-anonymous concern raised and closure of the case

Overview of a Whistle-blowing Process



I. <u>Whistle-blowing process: Initiation</u>

The ambit of reporting covers whistle-blowing concerns made in good faith either internally or externally. **Disciplinary action** will be taken against employees for any false report made for personal gain or malicious motive.

The report can be made verbally or in writing using the standard "Form to Report a Whistle-Blowing Concern" (see Page 8) which contains information on what to report. For all reports, including those raised anonymously, SASCO Home will maintain a proper register of all concerns received. It will send an acknowledgement of receipt to the whistle-blower, if the identity is provided, and all reported concerns will be assessed by SASCO Home. The whistle-blower should also be provided with subsequent information on the follow-up processes (e.g., assessment, investigation, and action) as appropriate.

Where the identity of the alleged person is known:

a) the escalation of alleged concern to the Whistle-blowing Governance Officer (or any designated person) (e.g., within 24 hours).
b) the formal acknowledgement of receipt (e.g., within two weeks).
c) any updates; and
d) the closure of the inquiry.

More specifically, (a) and (d) are considered in relation to anonymous alleged concern.

An employee is expected to raise the concerns directly to the Whistle-blowing Governance Officer.

In exceptional circumstances, cases may be raised with the immediate superior to then raise the concern directly to the Whistle-blowing Governance Officer. Cases may be via the Executive Office if the submissions are e.g. by hand. In cases where key management is involved or the concern is exceptionally serious, the whistle-blower can report to the chairman of the COM directly.

The whistle-blower can bypass the internal reporting mechanism and report the concern to the relevant external agency (e.g., Office of the Commissioner of Charities). Safeguards to protect confidentiality must be in place to protect the whistle-blower from reprisal, discrimination, and other adverse consequences.

II. Whistle-blowing process: Assessment

The Whistle-blowing Governance Officer is responsible for the assessment of all the concerns raised, including those which are anonymous in nature. The assessment examines whether the concerns raised are appropriate (i.e., they are not grievances), information provided is adequate to facilitate in the assessment and the nature of concerns (e.g., threats to health and safety, breach of laws, ethical code, and fraud) to establish their severity and implication to SASCO Home.

When the alleged person's identify is not known, attention should be made in relation to the likelihood of substantiating the allegation from the information provided and any relevant sources.

All assessments and analysis are to be consistent and properly documented, with decisions and outcomes clearly communicated to the appropriate parties on a timely basis.

Inappropriate concerns will not be investigated, and the responsible staff may be subject to disciplinary action. Except for anonymous reports, the whistle-blowers may be contacted for clarification or further details on the information provided in the "Form to Report a Whistle-Blowing Concern".

III. Whistle-blowing process: Investigation

The Whistle-blowing Governance Officer (or a designated staff) is responsible for the appointment of the investigator and members of the investigation team, where appropriate. If required, the COM and the Board or the Audit Committee should endorse the recommendation before formal appointment.

SASCO Home will assure the independence of the investigator in the performance of the investigation. The investigation team is empowered with the appropriate authority and must have the integrity and competency to gather and document facts, while preventing leakage of information. SASCO Home will provide adequate support, cooperation, and access of information to the investigator.

The parties involved in the investigation would be determined by the investigator depending on the nature, extent, timeline, and complexity of the case. Some possible parties may include the whistle-blower, alleged party, witnesses, key staff, management, BOARD members and external parties. Further information may be sought from the whistle-blower and the relevant parties in the investigation.

SASCO Home's investigation process comprises establishing the investigation objective, gathering of evidence, reporting on the findings, and providing recommendations. The duration of the investigation is dependent on the nature of the concern, evidence available and complexity of the case. The whistle-blower will be informed as soon as the investigation outcome is available.

The investigation report will be reviewed by the COM/Board or Audit Committee or a designated committee (e.g., comprising Head of Human Resources, Chief Internal Auditor, and other key personnel). Where appropriate, external advice may be sought to assist in the investigation and review of the investigation report (including the findings and recommendations).

The possible outcomes may include:

i. There are no grounds for the concern. Hence, there are no further actions required.
ii. There are grounds for the concern. Disciplinary action will be taken in accordance with SASCO Home's disciplinary policies (e.g., reprimand, suspension, and termination of employment). In addition, remedial measures will be taken to minimise recurrence; and
iii. There may be grounds for a possible criminal offence. COM/BOARD or Audit Committee should be informed, and legal advice may be sought on whether the matter should be referred to the relevant authority for the appropriate action. In all these circumstances, the whistle-blower will be notified of the outcome accordingly.

When the whistle-blower is not satisfied with the outcome of the investigation, he/she can raise the matter with adequate explanation to the Whistle-blowing Governance Officer (or designated staff). If there are reasonable grounds, SASCO Home will examine the concern. The whistle-blower can also raise this concern to a relevant external party.

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IV. Whistle-blowing process: Actions

In cases where there are no grounds for the concern, the Whistle-blowing Governance Officer (or a designated staff) will inform the whistle-blower of the outcome and close the case. Where there is ground for the concern, the Whistle-blowing Governance Officer must ensure that there is a person responsible for disciplinary matters (e.g., Head of Human Resources) and another person responsible for designing and implementing the remedial measures, which should be both practical and feasible.

When the matter must be escalated to an external party, there should be an acknowledgement of the receipt of the referral. The timeline for the implementation of the recommendation should be established to provide an indication on the closure of each case.

There should be a review and follow-up by the Whistle-blowing Governance Officer (or a designated staff) with support provided by the COM/BOARD or Audit Committee to ensure the proper closure of the case.

V. Communications & Training

The whistle-blowing policy is provided to employees by the whistle-blowing Governance Officer, or a designated staff. It is also accessible to all interested parties in SASCO Home's website.

The whistle-blowing policy is communicated to all staff when they join SASCO Home, and they are briefed on any updates as appropriate. For assistance on whistle-blowing matters, employees should approach the Head of Human Resources, Whistle-blowing Governance Officer, or the designated staff.

SASCO Home supports the training of staff involved in whistle-blowing to stay abreast of developments and to be properly equipped to handle whistle-blowing matters.

VI. Monitor & review

The Whistle-blowing Governance Officer or a designated staff monitors the status of the whistle-blowing process to ensure that it is operating as designed. Some examples include the trend of concerns raised compared to previous years, the number of concerns that failed to meet the established timeline, to record and report to the Whistle-blowing Governance Office, and the number of cases where the investigation progress is behind schedule. The monitored results should be reported to COM/BOARD or the Audit Committee.

Internal audit or an independent party will review the whistle-blowing policy for design effectiveness and will check that the procedures are operationally effective. The review is conducted annually or as directed by COM/BOARD or Audit Committee.

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SASCO WHISTLE-BLOWING REPORT FORM

This form is for reporting concerns raised in good faith about suspected misconduct or wrongdoing affecting SASCO Ltd, SASCO Senior Citizens' Home, or CCCS International Learning Institute.

(Personal or employment-related grievances should be addressed through normal HR or departmental channels.)

A. Whistleblower Details (NOT Optional)

(You may NOT submit this form anonymously.)

- Name: ________________________________
- Entity (tick one): ☐ SASCO Ltd ☐ SASCO Home ☐ CCCS ILI
- Designation / Relationship: ________________________________
- Contact (email / phone): ________________________________

B. Details of Concern

Type of Concern (tick all that apply):

☐ Fraud / Misuse of Funds
☐ Corruption / Bribery / Conflict of Interest
☐ Harassment / Discrimination
☐ Unethical Conduct
☐ Breach of Laws / Regulations
☐ Other: ________________________________

Description of Concern

(What happened, when, where, who was involved, and why you are concerned. Attach documents if any.)

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C. **Evidence / Witnesses (if any)**

- Supporting documents attached? ☐ Yes ☐ No
- Witnesses (if known): ____

D. Declaration

I confirm that this report is made in good faith and the information provided is true to the best of my knowledge.

Name / Signature: ____________________________ Date: ____________

This form is to be submitted in a confidential manner, via:

- Email marked "Whistle-blowing – CONFIDENTIAL"
  To: Secretary, Committee of Management, SASCO Ltd
  The Whistle-blowing Governance Officer
  skrishnan@sasco.sg

  If the concern involves the Secretary, you may via email to;

  The Chairman, SASCO Ltd at sgulam@silverscreen.sg;

Or By Hand, to
The Executive Office
991 Alexandra Road, #01-04,
Singapore 119964

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AMENDMENTS LOG

Version History

Version	Date	Version Author	Summary of Changes
1.0	24 Nov 2021	Eric Song	First Release
2.0	Oct 2024	Eric Song	Formatting
3.0	Feb 2026	Eric Song	Change in owner-dept of whistle-blowing policy; Whistle-blowing Governance Officer to be Sec, COM, and EO is the whistle-blowing secretariat.