

WHISTLE-BLOWING POLICY

1. Purpose

- 1.1. Jalan Kayu Town Council is committed to creating and maintaining a culture of high integrity and good corporate governance. The implementation of the whistle-blowing policy reinforces the Council's commitment to achieving service excellence in all of its practices.
- 1.2. Upholding a transparent and honest corporate culture, the Town Council takes any malpractice, inappropriate and improper misconduct seriously, as it will damage the reputation of the Town Council or potentially result in financial loss.

2. Objectives

- 2.1. This whistle-blowing policy serves to provide guidance for the employees, Council members, contractors and residents to lodge a report to the Town Council if he/ she observes or discovers any suspected malpractice or misconduct of employees, Council members and/or contractors of the Town Council.
- 2.2. No adverse/ detrimental action shall be taken against the whistle-blower if the report on a suspected misconduct was made in good faith.

3. Types of improper/ inappropriate practice and misconduct

- 3.1. Some examples of improper/ inappropriate practice or misconduct include, but are not limited to:
 - 3.1.1. Any reprisal action such as action causing injury, loss or damage.
 - 3.1.2. Intimidation or harassment that is physical, emotional and/or sexual in nature.
 - 3.1.3. Unethical behaviour or malpractice.
 - 3.1.4. Illegal acts or other wrongful or improper conduct within the Town Council that constitutes a disciplinary offence or a criminal offence.

4. Reporting procedures

- 4.1. A whistle-blower who is aware of any suspected improper/inappropriate practice and misconduct of an employee, Council member or contractors engaged by the Town Council, shall make a written report.
- 4.2. The report shall be sent to the Town Council Chairman and Audit Risk & Management Committee (ARMC) Chairman via the webpage or hardcopy mail.

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- 4.3. For reports made via hardcopy, the whistle-blower shall submit the written report in a sealed envelope marked “Private & Confidential” and mail it to **Blk 410 Fernvale Rd, #01-01, Singapore 790410**.
- 4.4. The sealed report sent to the Town Council Chairman and/or ARMC Chairman should include the following information to facilitate the investigation (but not limited to):
 - 4.4.1. Name and contact details (e.g., address, email or phone number) of the whistle-blower
 - 4.4.2. Time and date of the alleged act that took place.
 - 4.4.3. Clear description of the alleged act.
 - 4.4.4. Documentary/ audio/ visual evidence proof, if any.
- 4.5. Where the required information is not provided, the Town Council Chairman and/or ARMC Chairman has the right to determine if an investigation should proceed.
- 4.6. A complaint can be filed even if the whistle-blower is unable to identify a particular person that has committed an inappropriate or improper conduct.
- 4.7. The whistle-blower shall be expected to identify himself/herself in the report raised to ensure the authenticity and effectiveness of the investigation.
- 4.8. The whistle-blower shall render assistance in the investigation if the investigation requires the testimony and cooperation of the whistle-blower.
- 4.9. The Town Council shall investigate and treat any concerns raised in accordance to this policy with strict confidentiality.

5. Investigation procedures

- 5.1. The Town Council Chairman and/or ARMC Chairman shall initiate an investigation upon receipt of a report on suspected misconduct and appoint an independent working committee to conduct the investigation.
- 5.2. The working committee may comprise of officers, Town Councillors or members of the Audit and Risk Management Committee (“ARMC”).
- 5.3. The working committee shall review all the evidence, interview with the suspect(s) and witness(es) during the investigation process.
- 5.4. The interviews with suspect(s) and witness(es) shall be recorded and minuted.
- 5.5. After the investigation is completed, the lead investigation officer shall compile a report with all evidence and interview minutes and submit it to the Town Council Chairman/ARMC Chairman for review.

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- 5.5.1. The Town Council Chairman and/or ARMC 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 (e.g., any instance of conflict of interest noted and not declared during the investigation, any instance where investigation was not conducted thoroughly etc). This would be assessed on a case-by-case basis.
- 5.5.2. Where a fresh investigation may be required, the Town Council Chairman and/or ARMC Chairman may adopt the following options:
 - 5.5.2.1. Request that further investigation be conducted by the same investigation panel.
 - 5.5.2.2. Choose to conduct his own investigation if required
- 5.6. Where necessary, the Town Council shall consult and seek legal advice. For criminal offences and corruption cases, the matter may be referred to the Singapore Police Force ("SPF") or the Corrupt Practices Investigation Bureau ("CPIB").
- 5.7. If any improper/ inappropriate practice and misconduct is proven, the Town Council Chairman shall decide on the appropriate course of action to be taken that includes
 - 5.7.1. Reprimand, take disciplinary action and impose penalty
 - 5.7.2. Transfer employee to another department or office.
 - 5.7.3. Termination or suspension of employment or contract with any third-party vendors and report the matter to relevant authorities.
 - 5.7.4. Any other action deemed appropriate by the Town Council.
- 5.8. The Town Council Chairman and/or ARMC Chairman shall then communicate the result and the course of actions taken in writing to the suspect.
- 5.9. The Town Council Chairman and/or ARMC 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.
- 5.10. Any concerns raised by the whistle-blower on the Town Council Chairman shall be referred to the Chairman of the Audit and Risk Management Committee ("ARMC") for investigation. In such a scenario, the Chairman of the ARMC shall be conferred the same authority as the Town Council Chairman in the investigation.

6. Appointment and composition of the investigation panel

- 6.1. The Town Council Chairman and/or ARMC Chairman shall have the authority to appoint the investigation panel.

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- 6.2. The appointment of the investigation panel shall be decided by the Town Council Chairman and/or ARMC Chairman. Where the report names a particular employee/Council member who has purportedly committed an inappropriate or improper conduct, such employee/Council Member shall not be part of the working committee.
- 6.3. The working committee shall comprise of members based on the following factors:
 - 6.3.1. Able to maintain independence and confidentiality of the investigation.
 - 6.3.2. Subject matter expert of the alleged act committed.
 - 6.3.3. Display high levels of integrity.
 - 6.3.4. Able to be impartial at all times.
- 6.4. The size of the working committee shall be up to the discretion of the Town Council Chairman and/or ARMC Chairman.
- 6.5. The Town Council Chairman and/or ARMC Chairman shall notify the investigation panel in writing to inform them of their role in investigating the allegations made by the whistle-blower.

7. Contents of the investigation report

- 7.1. The content of the investigation report shall be documented by the investigation panel and submitted to the Town Council Chairman and/or ARMC Chairman for review.
- 7.2. The information of the investigation report shall contain
 - 7.2.1. Details of the incident.
 - 7.2.2. Investigation procedures taken.
 - 7.2.3. Outcome of the investigation and justification.
 - 7.2.4. Recommendations to the relevant department to take preventive measures to minimise and/ or prevent future recurrence.

8. Whistle-blower rights

- 8.1. The whistle-blower's identity shall be kept confidential at all times and will be given protection against the alleged party. This includes complaints made in good faith and conclusive investigations that states that no corrective action shall be taken against the alleged.
- 8.2. Any unsubstantiated complaints made by the whistle-blower in good faith shall not be subject to any disciplinary action (applicable to employees and/or Council Members).

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- 8.3. Any malicious, frivolous and vexatious allegation made by the whistle-blower for personal gain shall be subjected to disciplinary or police action (Note: disciplinary actions would be applicable for employees and/or Council Members only).
- 8.4. As all investigation reports are to be maintained confidential, such reports would not be accessible to any whistle-blower. Reports would only be accessible to the investigation panel, Town Council Chairman and ARMC Chairman.
- 8.5. A whistle-blower when submitting a report, should be aware that concerns or irregularities expressed anonymously are more difficult to act upon effectively. In the case where a whistle-blower submits a report anonymously, the Town Council Chairman and/or ARMC Chairman, upon receiving an anonymous report shall determine if there is sufficient information provided to conduct an investigation. Where insufficient information is provided, Town Council Chairman and/or ARMC Chairman reserves the rights to assess and conclude the report. Anonymous whistle-blowers will not be informed of the actions taken and conclusion of the investigations.

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9. Complaint Register

- 9.1. A Complaint Register that record details of all complaints received, including the date, nature and status of such complaints shall be maintained and restricted to the Town Council Chairman.
- 9.2. The Complaint Register shall be handed over to the succeeding Town Council Chairman if there are any changes in personnel.
- 9.3. The Complaint Register will maintain a record of all cases reported by whistle-blowers and the investigation reports **for a period of 5 years.**