

Whistle Blowing Policy

Introduction

This Whistle Blowing Policy aims to provide a framework for employees and external parties to report any concerns or complaints regarding any form of malpractice, wrongdoing or statutory non compliance, including but not limited to questionable accounting or auditing matters, internal controls, disclosure matters, conflict of interest, collusion with competitors, unsafe work practices or any other matters involving fraud, corruption and employee misconduct.

The Policy allows for reporting by employees or external parties without fear of reprisal, discrimination or adverse consequences and also permits POLWEL Co-operative Society Limited to address such reports by taking the appropriate action, including, but not limited to, disciplining or terminating the employment and/or services of those responsible.

Scope

Any employee, contract staff, vendor, contractor, third parties, applicants for employment, or member of the general public who notices, is aware of, or has any concerns about any actual or suspected wrongdoings committed by any POLWEL employee, staff, management, or contractor, can lodge a complaint.

Reportable incidents include, but are not limited to the following improper or unethical activities, actual or suspected:

- a. Corruption or bribery
- b. Embezzlement, cheating or theft
- c. Non-compliance with laws and regulations
- d. Irregularities in financial reporting, questionable accounting or audit matters
- e. Falsification or fraudulent alteration of documents (mandatory submissions to relevant authorities [eg: IRAS, MCCY etc.], contractual agreements, invoices, purchase orders etc.)
- f. Misuse/misappropriation of funds and resources
- g. Abuse or misrepresentation of power or authority
- h. Conflict of interest without due disclosure
- i. Breach or circumvention of internal policies
- j. Unauthorised access or disclosure of information
- k. Concealment or willful suppression of any malpractice or misconduct
- l. Acts to mislead, deceive, manipulate, coerce or fraudulently influence the preparation, examination, audit or review of any assets and records
- m. Unsafe work practices that endanger the health or safety of persons or environment
- n. Acts of harassment
- o. Professional malpractice, e.g. Violation of intellectual property rights,
- p. Acts of retaliation, intimidation or harassment, discrimination or unfair treatment against staff who have made an allegation or assisted in the investigation of an allegation

- q. Any other conduct that may cause financial, non-financial loss or damage of POLWEL's reputation
- r. Aiding and abetting illegal activities or any of the above misconduct

Confidentiality

POLWEL strongly encourages the whistleblower to leave his/her name in his/her complaint so that the organisation can get more information, seek clarifications and investigate the matter effectively.

To the extent practicable and/or permitted by law, POLWEL will keep the identity of the whistle-blower confidential. All concerns or irregularities raised will be treated with confidence and every effort will be made to keep the whole process confidential.

Exceptions where the identity of the whistleblower may need to be revealed include:

- a. It is required by law to reveal his identity,
- b. It is necessary as part of the investigation process to reveal the identity of the whistleblower,
- c. The whistleblower's identity is disclosed on a strictly confidential basis to professional service providers for the purpose of obtaining professional advice; or
- d. The whistleblower is required to testify as a witness in a civil or criminal trial.

Protection

The Policy is meant to protect genuine whistleblowers from any unfair treatment as a result of their report. A genuine whistleblower who files a complaint in good faith shall not be discriminated, intimidated or harassed, and POLWEL Co-operative Society Limited will take reasonable and appropriate action to protect all genuine whistleblowers who file a complaint in good faith.

If an allegation is made maliciously or for personal gain, appropriate action may be taken against the whistleblower. This may include disciplinary action (for employee), or reporting the matter to the police (for a 3rd party).

The Policy is also not a route for taking up personal grievances. These should continue to be taken up directly with department supervisors or the HR & Admin Department.

Procedures

1. Complaints may be raised with or information provided to:

(a) By Post

Please mark the letter "Private & Confidential"

For the attention of the Chairman, Audit Committee

POLWEL Co-Operative Society Limited

175A Bencoolen Street

#12-08 Burlington Square
Singapore 189650”

(b) By Email

Email Address: AuditCom@polwel.org.sg

Please mark the subject header of the email “**Private & Confidential** for the attention of the Chairman, Audit Committee, POLWEL Co-Operative Society Limited”

2. To the extent feasible, the whistleblower should provide the following information and details so that the matter can be assessed and investigated effectively. Details should include the following:
 - 2.1 Background and history of events
 - 2.2 Parties involved
 - 2.3 How was the impropriety discovered
 - 2.4 Value involved
 - 2.5 Evidence (if any)
3. All information received will be treated with confidentiality.
4. Assessment of the concern or information shall be made with due consideration given to the following factors:
 - 4.1 Seriousness of the issue raised
 - 4.2 Credibility of the concern or information; and
 - 4.3 Likelihood of confirming the concern or information from the attributable sources
5. The Audit Committee will have overall oversight of this Policy and may at its absolute discretion delegate the investigation to such person (internal or external) as it deems fit, and/or may refer the matter to the authorities or regulators as it deems appropriate.
6. Further information may be sought from the whistle blower during the course of the investigation. When the investigation is completed, the investigating officer(s) will report the findings to the Audit Committee for its necessary action.

POLWEL Co-operative Society Limited reserves the right to modify this Policy to maintain compliance with any applicable laws and regulations and/or in light of any restructuring of POLWEL Co-operative Society Limited.

Version Control

S/N	Version	Description	Effective Date
1	1.0	Initial Version	1 April 2016