

Whistle Blowing Policy

PURPOSE

The Chinese Development Council (CDAC) is committed to a high standard of compliance with accounting, financial reporting, internal controls, auditing requirements and all applicable laws. In keeping with this commitment and CDAC's Vision as a Committed and Trusted Organisation, this policy aims to provide an avenue for employees and external parties to raise concerns and offer them an assurance that they will be protected from possible reprisals for whistle blowing in good faith.

SCOPE

This policy applies to all employees of CDAC (all permanent and contract staff) and external parties (eg. contractors and volunteers) who have business relationships with CDAC.

REPORTABLE INCIDENTS

This policy is intended to cover serious concerns that could have a significant impact on CDAC, including but not limited to those relating to unlawful conduct, financial malpractice or dangers to the public or the environment.

SAFEGUARDS

The whistle blower shall not be at risk of losing his/ her job or suffering any form of retribution as a result provided that:

- (a) the disclosure is made in good faith;
- (b) there is reasonable belief that the information, and any allegations contained in it, are substantially true; and
- (c) Whistle blower is not acting for personal gain.

No action will be taken against anyone who makes an allegation in good faith, reasonably believing it to be true, even if the allegation is not subsequently confirmed by the investigation.

CDAC will not tolerate any harassment or victimisation (including informal pressures) and will take appropriate action to protect those who raise a concern in good faith.

Every effort will be made to ensure confidentiality as far as it is reasonably practical.

PROCEDURE FOR REPORTING

Whistle blower must provide clear identification when raising a concern. Anonymous reports will still be given due consideration by CDAC but will be investigated on their own merits.

Concerns may be raised verbally or in writing. If the concern is raised verbally, the person receiving the information should put it in writing as soon as practicable to ensure that it properly reflects the concerns that have been raised. Whistle blowers who wish to make a written report should provide the background information on the concern (giving relevant dates) and the reason(s) why they are particularly concerned about the situation.

Concerns or information can be raised directly to the Executive Director of CDAC or the Chairman of the Audit and Risk Committee or the Chairman of the Board of Directors via the following email addresses:

- (a) Executive Director (email: wbed@cdac.org.sg); or
- (b) Chairman of the Audit and Risk Committee (email: wbarchair@cdac.org.sg); or
- (c) Board Chairman (email: wbbodchair@cdac.org.sg).

HANDLING OF COMPLAINTS

The Officer handling the concern must look into it to assess initially what action should be taken. This may involve an internal inquiry or a more formal investigation. Any follow up action should be communicated clearly to the person raising the concern within four weeks of a concern being raised.

Where appropriate, concerns/matters raised may be:

- investigated by management, or
- investigated by Audit & Risk Committee; or
- investigated by the Board; or
- referred to the Police; or
- referred to the external auditor; or
- to form an independent inquiry.

If a whistle blower takes the matter outside CDAC, he/ she should ensure that no disclosure of confidential information takes place.

FURTHER INFORMATION

The amount of contact between the whistle blower and the person(s) investigating the concern raised or information provided will be determined by the nature and clarity of the matter/ information initially reported. Further information may be sought from whistle blower during the course of the investigation.