

SLF GROUP WHISTLEBLOWING POLICY
(Aranda Country Club, Pasir Ris Resort Pte Ltd)

1. INTRODUCTION

- 1.1 Singapore Labour Foundation and its subsidiaries ('the Group') are committed to a high standard of compliance with accounting, financial reporting, internal controls, corporate governance and auditing requirements and any legislation relating thereto.
- 1.2 The Group has an established Code of Ethics ('Code') which sets out the standards of conduct expected in the management of its business. All employees are expected to carry out their duties in a manner that is consistent with the Code.
- 1.3 The Whistleblowing Policy ('Policy') aims to provide an avenue for Board members, employees and external parties to raise genuine concerns, in confidence, about possible irregularities.

2. OBJECTIVES OF THIS POLICY

- 2.1 Documents the processes and avenues for raising concerns of any suspected wrongdoing, as well as provides guidelines on the management and investigation of such reports.
- 2.2 Deter wrongdoing and to promote standards of good corporate practices.
- 2.3 Provision of proper avenues for employees to raise concerns about actual or suspected improprieties in matters of financial reporting or other matters and receive feedback on any action taken.
- 2.4 Give employees the assurance that they will be protected from reprisals or victimization for whistleblowing in good faith.

3. REPORTABLE INCIDENTS

- 3.1 The scope of the policy covers any wrongful practices, except Human Resource grievances and complaints (e.g. job performance and terms and conditions of employment etc.) and staff discipline matters, which will continue to be addressed via the existing Human Resource channels.

3.2 “Wrongful practices” include mismanagement and misuse of resources, or inappropriate conduct and behaviour. The following listing provides some examples but is not exhaustive:

- Concerns about the Group’s banking and treasury, procurement, accounting, business sensitive information, internal controls or auditing matters;
- Breach of or failure to implement or comply with the Group’s policies or code of conduct;
- Impropriety, corruption, acts of fraud, theft and/ misuse of the Group’s properties, assets or resources;

- Conduct which is an offence or breach of the law;
- Abuse of power or authority;
- Conflict of interest without disclosure;
- Disclosure of confidential information to outsiders;
- Intentional provision of incorrect information to public bodies;
- Fraud against stakeholders, or the making of fraudulent statements to stakeholders and regulatory authorities;

- Acts to mislead, deceive, manipulate, coerce or fraudulently influence any internal or external accountant or auditor in connection with the preparation, examination, audit or review of any financial statements and records or operations of the Group;

- Compromise of the health and safety of an individual;
- Concealing information about any malpractice or misconduct;

- Any other improper matters which may cause financial or non-financial loss to the Group, or damage to the Group’s reputation.

3.3 In cases of doubt, the whistleblower should seek to speak to his or her immediate superior or follow the procedure for reporting under this Policy.

4. PROTECTION AGAINST REPRISALS

- 4.1 If the disclosure was made in good faith, the whistleblower can rest assured that no action will be taken against him/her even if subsequent investigations reveal no wrongdoing. An employee who raises a genuine concern under this Policy will not be at risk of losing his or her job or suffering from victimization or harassment as a result.
- 4.2 The Group will take all reasonable steps to protect the whistleblower from reprisal or negative personal consequences. If it is determined that a whistleblower experienced any reprisal or victimization which should not have occurred, the PRRP Audit and Risk Committee shall recommend appropriate remedial actions to be taken.
- 4.3 However, the Group does not condone frivolous, mischievous or malicious allegations. Employee(s) making such allegations will face disciplinary action, as appropriate.

5. CONFIDENTIALITY

- 5.1 The Group encourages the whistleblower to identify himself/ herself when raising a concern or providing information. The whistleblower's identity as well as concerns raised will be treated with strictest confidentiality.
- 5.2 Exceptional circumstances under which information provided by the whistleblower may need to be disclosed include:
 - Where the Group is under a legal obligation to disclose the information provided;
 - Where the information is already in the public domain;
 - Where the information is given on a strictly confidential basis to legal/ auditing or other professionals for the purposes of obtaining professional advice/ assistance;
 - Where the information is given to the Police or other authorities for criminal investigation.
- 5.3 In the event Management is faced with a circumstance not covered by the above, and where the whistleblower's identity is to be revealed, Management will endeavour to discuss this with the whistleblower first.

- 5.4 In order not to jeopardise the investigations into the alleged malpractice, the whistleblower is expected to keep the disclosure and all details pertaining to it strictly confidential.

6. CONCERNS AND INFORMATION PROVIDED ANONYMOUSLY

- 6.1 The Group will consider anonymous reports, but concerns expressed or information provided anonymously will be investigated on the basis of their merits.

7. HOW TO RAISE A CONCERN OR PROVIDE INFORMATION

Who to Report To

- 7.1 SLF Risk Management and Internal Audit (1 Marina Boulevard, Level 10, One Marina Boulevard, Singapore 018989, DID: 6213 8374; or e-mail: engage@slf.gov.sg).
- 7.2 Alternatively, the concern could be raised through the independent whistleblowing hotline and e-mail address, for which details could be found in Appendix I.
- 7.3 If none of the channels above are suitable, the whistleblower can address his/her concerns to the Chairman of the PRRP Audit and Risk Committee. Board members who wish to raise concerns may address his/her concern to the Chairman of the PRRP Board. Contact details have been included in Appendix I.
- 7.4 Concerns or information are preferably raised or provided in writing or e-mail. Ideally, the Group recommends the whistleblower to be detailed in setting out the background and history of events and the reasons for the concern. The whistleblower can refer to the Appendix II for the details to be reported.
- 7.5 If the whistleblower is not comfortable about writing in, he or she can telephone or meet the appropriate officer in confidence at a time and location to be determined together.

8. IMPORTANT POINTS TO NOTE WHEN RAISING A CONCERN OR PROVIDING INFORMATION

- 8.1 The earlier the concern is raised the easier it is for the Group to take effective action.

- 8.2 The Group expects the whistleblower to provide his/her concern in good faith and to show to the appropriate officer that there are sufficient grounds for his/her concern.
- 8.3 The Group also recognizes that the whistleblower may wish to seek advice and be represented by his/her trade union officer.

9. HOW THE GROUP WILL RESPOND

- 9.1 The Group assures that any legitimate concern raised or information provided will be reviewed and investigated if deemed necessary. The following factors will be taken into consideration:
- Severity of the issue raised;
 - Credibility of the concern or information; and
 - Likelihood of confirming the concern or information from attributable sources.
- 9.2 Upon receipt of a report of wrongful practice, the Group will decide how best to proceed with the matter and whether to initiate investigations. Where necessary, an independent investigation officer may be appointed, or Board of Inquiry Committee may be formed, or the matter may be referred to the Police or the Corrupt Practices Investigation Bureau (CPIB) for further investigations, if it involves criminal or corrupt acts.
- 9.3 Chairman of the PRRP Audit and Risk Committee should be kept informed unless it is inappropriate to do so (such as in the event the concern involves them).
- 9.4 The amount of contact between the whistleblower and the person(s) investigating the concern raised and information provided will be determined by the nature and clarity of the matter reported. Further information provided maybe sought from the whistleblower during the course of the investigation.
- 9.5 The investigating officer(s) will communicate the findings of the investigation(s) to the PRRP Audit and Risk Committee for their necessary action.
- 9.6 On a regular basis, all whistleblowing cases reported, and their resolution would be reported to the PRRP Audit and Risk Committee.

Whistleblowing Hotlines

SLF Risk Management and Internal Audit

Address: Singapore Labour Foundation
1 Marina Boulevard, Level 10,
One Marina Boulevard,
Singapore 018989

Telephone: 6213 8374

E-mail: engage@slf.gov.sg

External hotline

This is provided through the independent party who provide internal audit services to the Group.

Address: EY Advisory Pte Ltd
One Raffles Quay,
North Tower, Level 18,
Singapore 048583
Attention: Neo Sing Hwee / Veron Wong / Gan Soo Ing

Telephone: 6309 6710 / 6309 6951

E-mail: slfwhistleblow@sg.ey.com

PRRP Audit and Risk Committee Chairperson – Mr. David Poh

E-mail: david_poh@slf.gov.sg

For follow-up and thorough investigation of the allegations, the disclosure should contain as much detail as possible, including (but not limited to):

- Nature of the alleged wrongful practice;
- Names of people allegedly involved;
- Names of any witnesses;
- Date, time and location of incident (including multiple occurrences);
- When the incident was first observed;
- Details of any evidence you may have or know of;
- The value of any money or asset involved;
- Frequency of occurrence; and
- Name and contact details of whistleblower

Example of Whistleblowing Report

Name of Whistleblower: _____

Identity would be kept strictly confidential as per para 5 of the whistleblowing policy. However, if whistleblower wishes to remain anonymous, to state so clearly. Refer to para 6 of the policy for the Group's stance with respect to anonymous reports.

Company/Department: _____

Designation: _____

Date: _____

Time: _____

Contact Information: _____

Description of Case (*Describe the suspected improper activity or misconduct and how you know about it. Specify who, what, when, where and how, and provide evidence where available.*):

Please attach additional sheets as necessary.