Whistle – Blowing Policy

Purpose

Tanjong Pagar Town Council (TPTC) is committed to providing a high quality living environment for the HDB residents in Tanjong Pagar Town (TC's mission).

The implementation of the Whistle-Blowing Policy underpins TPTC's efforts towards upholding its stance of zero tolerance against detrimental action and improper conduct which may cause financial or non-financial loss to TPTC or damage TPTC's reputation. The objectives of this Policy are to provide:

- Avenue for Whistle-blower to report to the Town Council (TC) if he/she observes or discovers any detrimental action and improper conduct of employees, council members or contractor in the Town Council; and

- Assurance that no adverse personnel action would be taken against Whistle-blower in retaliation for his/her disclosures in good faith of any detrimental action or improper conduct.

Detrimental actions may include
- any reprisal action which shall include action causing injury, loss or damage;
- intimidation or harassment;
- interference with the lawful employment or livelihood;

Improper conduct may include
- any unethical behaviour;
- malpractices;
- illegal acts or any other wrongful or improper conduct within TC, which if proven, constitutes a disciplinary offence or a criminal offence.

Reporting process

Whistle-blower who is aware of any suspected detrimental action and improper conduct carried out by any employees, council members, contractors of the TC should make a written report (in sealed envelope marked **"Private & Confidential"**) as soon as possible to the TC Audit Committee Chairman and mail it to the following address:

Block 166 Bukit Merah Central #03-3527 Singapore 150166

The Whistle-blower can also email the matter directly to Audit Committee Chairperson at whistleblowing@tptc.org.sg.

The content of the mailed report/ email shall include the following:
- The name and address of the Whistle-blower
- The time and date that the alleged act had taken place
- Clear description of the alleged act
- Documentary/audio/visual evidence of the alleged act committed (if available)

All concerns raised would be treated with strict confidentiality. The Whistle-blower is expected to identify himself/herself when raising a concern. This will enhance the accountability and effectiveness of the investigation and facilitate feedback to the Whistle-blower. It must be appreciated that the investigation process may sometimes require the Whistle-blower to render assistance in the investigation. As such, we will not be able to proceed with the investigation if we do not have the name and contact details of the Whistle-blower.

A complaint can be made even if the Whistle-blower is not able to identify a particular person to which the Detrimental Actions or Improper Conduct relates.

Investigation procedures

1. TC Secretary or an officer directed by the TC Audit Committee Chairman will lead the investigation. Such investigation will be conducted in a fair manner as a neutral fact-finding process and without any presumption of guilt. Where necessary, the investigation team should consult and seek legal advice. Where criminal offence and corruption are involved, the matter may be referred to the Police or the Corrupt Practices Investigation Bureau (CPIB).

2. The investigation team should handle all matters with confidentiality and complete the investigation promptly. All relevant documents received by the investigation team shall be recorded and filed.

3. To safeguard against possibility of bias, prejudice or conflict of interest, the person being complained shall not be participating/involved in the investigation team.

4. The investigation team shall outline the detailed procedures for the investigation. In discharging its responsibility, the delegated investigation team shall have access to TC's management, books and records which the investigation team believes to be relevant to the complaint and shall be entitled to examine any employee or any other person(s) as it deems appropriate and to receive such information as it requires from them. All relevant personnel shall co-operate with any reasonable request made by the investigation team.

5. Upon receipt of the report on the findings of the investigation, TC Audit Committee Chairman will review and evaluate the findings. If the TC Audit Committee Chairman is not satisfied with the findings of the investigation, the TC Audit Committee Chairman has the right to either
    - Direct a fresh investigation or request that further investigation be conducted by the same investigation team or a fresh investigation by investigation team consisting of new members;
    - Conduct its own investigation.

6. Disciplinary action may be taken against the parties reported. Corrective action would be taken to address any lapses in controls and procedures, if applicable.

7. If the detrimental action or improper conduct is proven, the TC Audit Committee Chairman shall decide on the appropriate course of action to be taken, which may be any of the following:

    (i) Against the employee (including Managing Agent staff), council member or contractor found to have committed the detrimental action or improper conduct:

    - Reprimand, take disciplinary action, impose punishment
    - Transfer to another department/ relocation of place of employment
    - Termination or suspension of employment
    - Report the matter to relevant authorities
    - Any other action deemed appropriate by TC

    (ii) Preventive measure for the future

    Make recommendation to the relevant department to implement procedures or take preventive measures to minimize or prevent the occurrence of the detrimental action or improper conduct in the future.

8. The decisions on the corrective actions to be taken and the action against the person(s) found to have committed the detrimental action or improper conduct shall be communicated in writing (after consulting the Corporate Communications Team) to the Whistle-blower.

Protection of Whistle-blower

Protection will be provided to Whistle-blower so that the person against whom a compliant is made could not take any retaliation on the Whistle-blower. The protection accorded to the Whistle-blower is

not limited or affected in the event that a Complaint made by the Whistle-blower in good faith does not lead to any corrective action taken against the person(s) against whom the Complaint or Report has been made.

Whistle-blowers, who has reported a concern is subsequently found to be unsubstantiated, should not be subject to any disciplinary action if he/she has reported the concern in good faith. However, if the complaint is made out of a malicious, frivolous and vexatious allegation or consideration of personal gain, the Whistle-blower may be subject to disciplinary or police action.

Complaint Register

TC Chairman shall maintain a Compliant Register for the purpose of recording details of all complaints received, including the date, the nature and the status of such complaint. The Complaint Register shall be handed over to succeeding TC Chairmen.