

Whistleblowing Policy & Procedures

Sembawang Country Club (SCC) is committed to upholding the highest standards of ethical, moral, and legal business conduct.

Purpose and Scope

SCC maintains a zero-tolerance approach toward malpractice, impropriety, statutory non-compliance, or wrongdoing by employees or external parties in the course of their dealings with the club. This **Whistleblowing Policy** (the "Policy") establishes a framework to encourage responsible whistleblowing without fear of retaliation.

The Policy is applicable to all employees and external parties, including suppliers, members, and stakeholders, who are encouraged to report any concerns regarding the following areas:

- **Accounting or auditing practices**
- **Internal controls**
- **Disclosure matters**
- **Conflicts of interest**
- **Fraud, corruption, or other forms of employee misconduct**

Objectives of the Policy

The Policy aims to achieve the following objectives:

1. **Encourage Early Reporting:** Facilitate the prompt reporting of serious concerns to the **Chairman of Audit Sub-Committee** so that timely action can be taken.
2. **Provide a Trusted Reporting Channel:** Offer a reliable and confidential avenue for employees, members and external stakeholders to report concerns regarding unethical conduct.
3. **Ensure Independent Investigation:** Implement procedures for conducting thorough, impartial investigations of reported concerns and ensure that appropriate follow-up actions are taken.
4. **Promote a Culture of Integrity:** Foster an organisational culture of accountability, transparency, and ethical behaviour.

Scope of Reportable Irregularities

Whistleblowers may report concerns relating to, but not limited to, the following:

1. **Accounting, Internal Controls, or Auditing Matters:** Irregularities or questionable practices.
2. **Corruption and Fraud:** Acts of bribery, fraud, theft, or misuse of SCC's resources.
3. **Legal Breaches:** Conduct that violates the law or regulations.
4. **Conflicts of Interest:** Unreported or undisclosed serious conflicts of interest.
5. **Policy Violations:** Breaches of SCC's internal policies or codes of conduct.
6. **Concealment of Misconduct:** Intentional concealment of any of the above irregularities.
7. **Other Serious Misconduct:** Any conduct that may result in financial or reputational damage to SCC.

Reporting Channels

Whistleblowers may submit reports through the following channels:

Contact Information:

Chairman of the Audit Sub-Committee

Sembawang Country Club
249 Sembawang Road
Singapore 758352

Email: audit@sembawanggolf.org.sg

Guidelines for Reporting:

1. **Written Reports:** Concerns should be submitted in writing, either by post or email, and must be clearly marked as **"PRIVATE AND CONFIDENTIAL – TO BE OPENED BY ADDRESSEE ONLY"**.
 - For physical mail, use registered post to ensure secure delivery.
 - Reports should contain all relevant details, including the whistleblower's contact information. **Anonymous reports shall not be entertained.**
 - Whistleblowers may download this form and fill out the necessary details.
2. **Personal Discussion:** If a whistleblower wishes to meet in person, they should include contact information such as their contact number in their report.
3. **Confidentiality:** All reported concerns will be acknowledged and treated with strict confidentiality throughout the investigation process.

Protection Against Retaliation

SCC is committed to protecting whistleblowers from any form of retaliation, discrimination, or victimization. Individuals who report concerns in good faith will not face adverse consequences for coming forward. Any act of retaliation against a whistleblower will be treated as a serious disciplinary matter.

Follow-up and Resolution

Upon receiving a report, **Chairman of the Audit Sub-Committee** will conduct an independent investigation into the matter. Appropriate corrective actions will be taken based on the findings.