



# SOCIETY FOR THE AGED SICK

130 Hougang Avenue 1, Singapore 538900 • Tel: (65) 6922 6222 • Fax: (65) 6289 3227  
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## WHISTLE BLOWING POLICY FOR SOCIETY FOR AGED SICK

### 1. INTRODUCTION

- 1.1 The Society for the Aged Sick (“**SAS**”) is committed to maintaining the highest standards of compliance, governance, integrity, ethics, legal conduct and accountability. In line with SAS core values, this whistleblowing policy (“**Policy**”) strives to create an open and transparent culture where employees and other persons are provided with a proper channel to raise concerns or report any aspect of SAS’s operations, including any actual or suspected impropriety, malpractice or misconduct or other wrong-doing without any fear of reprisal or victimisation.
- 1.2 This Policy provides a mechanism for any employee of SAS or any other person to raise genuine concerns about wrong-doing without fear of reprisals and in the case of employees, job loss or disciplinary proceedings so long as the employee in good faith holds an honest and reasonable suspicion about such wrong-doing.

### 2. SCOPE AND DEFINITIONS

- 2.1. For the purposes of this Policy, whistleblowing is defined as a voluntary disclosure made (whether orally or in writing) by an employee or any other person pertaining to an actual, suspected or anticipated impropriety, malpractice, misconduct, breach of law, conflict of interest without full disclosure, fraud, corruption, theft/misappropriation or other wrong-doing (**collectively, “Wrong Doing”**) that will directly or indirectly affect SAS and its various stakeholders.
- 2.2. For the avoidance of doubt, this Policy does not cover concerns or complaints about an employee’s personal welfare and/or employment position in SAS. Any such concerns or complaints should be appropriately raised through SAS’s Human Resource channels.



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### 3. REPORTABLE INCIDENTS

Employees of SAS and others are encouraged to report concerns of actual, suspected or anticipated Wrong-Doing as soon as practicable. Some examples of reportable incidents of Wrong-Doing include, but shall not be limited to:

- a) Improper conduct which is an offence or a breach of law;
- b) Impropriety, corruption, bribery, acts of fraud, forgery, theft/misappropriation/misuse of SAS's properties;
- c) Conflict of interest without full disclosure;
- d) Breach of SAS's policies and/or code of conduct;
- e) Conduct likely to damage SAS's reputation;
- f) Conspiracy;
- g) Breach of legal obligations;
- h) Misleading, deceiving and/or unduly influencing any internal or external accountant or auditor in connection with the preparation, audit or review of any financial statements or official records of SAS;
- i) Unauthorised disclosure or use of confidential information belonging to SAS; and
- j) Deliberate omission or concealment pertaining to any of the above matters.

### 4. PROTECTION OF WHISTLE BLOWER

- 4.1. Pursuant to this Policy, an employee or any other person who raises genuine concerns regarding any Wrong-Doing in good faith ("**whistle blower**") shall be protected against reprisals, and in the case of a whistle blower who is an employee, against employment



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termination or disciplinary action as mentioned above in paragraph 2.1. The whistle blower is not required to prove any Wrong-Doing. A good faith, honest and reasonable suspicion raised that Wrong-Doing has been or is likely to be committed is adequate and so long as the whistle blower is acting honestly and reasonably, it does not matter if the whistle blower is mistaken about his/her concern.

- 4.2. SAS will not tolerate the victimisation or harassment of whistle blowers that have raised a concern under this Policy. All allegations of such treatment will be taken seriously and if well founded, will be duly investigated. Any employee who is found to have treated a whistle blower in such manner (whether directly or indirectly) will be subject to disciplinary action.
- 4.3. Employees should note that if any whistle blowing allegation of Wrong-Doing made is false, malicious, vexatious, misleading or frivolous or is made in bad faith, SAS will consider this to be serious misconduct and the whistle blower employee will be liable to disciplinary action.

## 5. REPORTING PROCEDURE

- 5.1. Concerns should be raised as soon as practicable, and include, in as much detail as possible, the identity and particulars of the parties involved, history of events, reason(s) for concern and any other relevant information or documentation that would assist SAS in its investigations.
- 5.2. Concerns may be raised in writing to:  
  
By email: [\*\*whistleblowing@societyagedsick.org.sg\*\*](mailto:whistleblowing@societyagedsick.org.sg)
- 5.3. The concern(s) received will be reviewed by the Head of Human Resources (Sub-Committee). The whistle blower may also write to SAS's Executive Committee (the "**Board**") if the whistle blower believes it is inappropriate for any reason to report the concern to Head of Human Resources (Sub-Committee).



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- 5.4. SAS endeavours not to reveal the identity of the whistle blower and all concerns raised will be treated with strictest confidence except as necessary or required to be disclosed by law.
- 5.5. Any concern raised or information provided anonymously shall be given due consideration on the basis of its merits and at the absolute discretion of SAS. As SAS takes all concerns raised seriously, the whistle blower is encouraged to identify himself or herself and also provide the relevant contact details to assist in the conduct of its investigations.

## 6. ACTION TAKEN

- 6.1. The action(s) taken by SAS will depend on the nature and gravity of the concern raised. In assessing whether SAS should take action on the concern raised, due consideration shall be given to the following factors:
  - a) seriousness of the issue raised;
  - b) credibility of the concern raised or information disclosed; and
  - c) likelihood of confirming the concern raised or information disclosed from the attributable sources.
- 6.2. Depending on the nature of the concern raised or information provided, the investigation will be conducted involving one or more of the following individuals or entities:
  - a) SAS's Management team;
  - b) SAS's Board;
  - c) external expertise or auditor; or
  - d) Police, Corrupt Practices Investigation Bureau or Commercial Affairs Department.



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- 6.3. SAS reserves the absolute right and discretion to refer any concerns raised or complaints to the relevant external authorities and/or take any appropriate internal disciplinary actions or measures.
- 6.4. The amount of communication between the whistle blower and the relevant individual(s) or entity investigating the concern raised or information provided shall be determined by the nature and clarity of the matter reported. Further information may be sought from the whistle blower during the course of the investigations as and when necessary.
- 6.5. When the investigation is complete, the investigating party shall report the findings to SAS's Board, for its necessary action. SAS will consider the appropriate time and manner to inform the whistle blower of the outcome of the investigation but shall not be obliged to do so.
- 6.6. SAS shall not be obliged to act on any complaints, concerns or disclosure if in its discretion, it is of the view that the complaint, concern or disclosure does not possess sufficient merit or supporting documents for SAS to proceed with the conduct of an investigation.
- 6.7. Under no circumstances whatsoever or howsoever arising shall SAS or its Board, executives and/or management be liable for omitting to take any action as a result of whistleblowing, defamation and/or slander.