



**THE SINGAPORE TEACHERS' CO-OPERATIVE SOCIETY LTD**

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## **WHISTLEBLOWING**

### **INTRODUCTION**

This whistle-blowing policy aims to provide a framework for employees and external parties to report any concerns or complaints regarding any form of malpractice, wrongdoing or statutory non-compliance, including but not limited to questionable or audit matters, internal controls, disclosure matters, conflict of interest, collusion with competitors, unsafe work practices or any other matters involving fraud, corruption, COM or employee misconduct.

The Policy allows for reporting by employees or external parties without fear or reprisal, discrimination or adverse consequences and also permits STCS to address such reports by taking the appropriate action, including, but not limited to, disciplining or terminating and/or services of those responsible.

### **SCOPE**

Any COM member, employee, vendor, contractor, third party, applicant for employment, or member of the general public who notices, is aware of, or has any concern about any actual or suspected wrongdoings committed by any STCS COM member, employee, staff, management or contractor, can lodge a complaint.

Reportable incidents include, but are not limited to the following improper or unethical activities, actual or suspected:

- a. Corruption, embezzlement, cheating, theft or bribery
- b. Misuse/misappropriation of funds and resources
- c. Irregularities in financial reporting, questionable accounting or audit matters
- d. Non-compliance with laws and regulations
- e. Falsification or fraudulent alteration of documents (mandatory submissions to relevant authorities {e.g. IRAS, MCCY, etc}, contractual agreements, invoices, purchase orders, etc)
- f. Abuse or misrepresentation of power or authority
- g. Conflict of interest without due disclosure
- h. Breach or circumvention of internal policies
- i. Unauthorised access or disclosure of information
- j. Concealment or wilful suppression of any malpractice or misconduct
- k. Acts to mislead, deceive, manipulate, coerce or fraudulently influence the preparation, examination, audit or review of any assets and records
- l. Unsafe work practice that endangers the health or safety of persons or environment
- m. Acts of harassment
- n. Professional malpractice e.g. violation of intellectual property right
- o. Acts of retaliation, intimidation or harassment, discrimination or unfair treatment against staff who have made an allegation or assisted in the investigation of an allegation
- p. Any other conduct that may cause financial, non-financial loss or damage of STCS reputation
- q. Aiding and abetting illegal activities or any of the above misconduct

- r. Breach of confidentiality in **Co-op's** or members' information

STCS strongly encourages the whistle-blower to leave his/her name in his/her complaint so that the co-op can get more information, seek clarifications and investigate the matter effectively.

To the extent practicable and/or permitted by law, the **Co-op** will keep the identity of the whistle-blower confidential. All concerns or irregularities raised will be treated with confidence and every effort will be made to keep the whole process confidential.

Exceptions where the identity of the whistle-blower may need to be revealed include:

- a. It is required by law to review his identity.
- b. It is necessary as part of the investigation process to reveal the identity of the whistle-blower.
- c. The whistle-blower's identity is disclosed on a strictly confidential basis to professional service providers for the purpose of obtaining professional advice, or,
- d. the whistle-blower is required to testify as a witness in a civil or criminal trial.

## **PROTECTION**

The Policy is meant to protect genuine whistle-blowers from any unfair treatment as a result of their reports. A genuine whistle-blower who files a complaint in good faith shall not be discriminated, intimidated or harassed and STCS will take reasonable and appropriate action to protect all genuine whistle-blowers who file a complaint in good faith.

If an allegation is made maliciously or for personal gain, appropriate action may be taken against the whistle-blower. This may include disciplinary action (for employee) or reporting the matter to the police (for a third party).

The Policy is also not a route for taking up personal grievances. These should continue to be taken up directly with department supervisors or the HR & Admin Department.

## **PROCEDURE**

1. Complaints may be raised with information provided to:

- (a) By Post

Please mark on the envelope and letter "**Private and Confidential**"

For the attention of '**The Chairman, Audit committee**'

**THE SINGAPORE TEACHERS' CO-OPERATIVE SOCIETY LTD**

**150 CHANGI ROAD**

**#02-06 GUTHRIE BUILDING**

**SINGAPORE 419973**

- (b) By email: [whistleblowing@teachersco-op.org.sg](mailto:whistleblowing@teachersco-op.org.sg)

Please mark the subject header of the email "**Private & Confidential**", Attn: The Chairman, Audit Committee of STCS

2. To the extent feasible, the whistle-blower should provide the following information and details so that the matter can be assessed and investigated effectively. Details of the submission should include the following:
  - a. Background and history of events.
  - b. Parties involved.
  - c. How the impropriety was discovered.
  - d. Value involved.
  - e. Evidence (if any).
3. All information received will be treated with confidentiality.
4. Assessment of the concern or information shall be made with due consideration given to the following factors:
  - a. Seriousness of the issue raised
  - b. Credibility of the concern or information; and
  - c. Likelihood of confirming the concern or information from the attributable sources.
5. The Audit Committee will have overall oversight of this Policy and may at its absolute discretion delegate the investigation to such person (internal or external) as it deems fit, and/or may refer the matter to the authorities or regulators as it deems appropriate.
6. Further information may be sought from the whistle-blower during the course of the investigation. When the investigation is completed, the investigating officer(s) will report the findings to the Audit Committee or its necessary action.

STCS reserves the right to modify this Policy to maintain compliance with any applicable laws and regulations and/or in light of any restructuring of STCS.

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**150 CHANGI ROAD #02-06 GUTHRIE BUILDING SINGAPORE 419973**

**WHISTLEBLOWING**

Name: \_\_\_\_\_ (Optional)

Address: \_\_\_\_\_

Email : \_\_\_\_\_ H.P No \_\_\_\_\_

1. Summarize in ONE PAGE OR LESS the disclosure and/or abuse. Please specify to whom you have disclosed this information. (e.g. your employer and/or government authorities.) Please specify and describe the substance or your disclosure(s) so that we may fully understand the scope and magnitude. Please include dates and details in chronological order if feasible.
2. What, if any, adverse employment actions (e.g. suspension, retaliation and /or termination) have occurred against you due to your whistleblowing activity. Please include dates.
3. What are your goals in this matter?
4. Are you currently involved in any on-going legal administrative proceedings? Please specify.

\_\_\_\_\_

Signature

Date: \_\_\_\_\_