

Whistleblowing Policy

Introduction and Policy Statement

Breast Cancer Foundation (“**BCF**”) is a not-for-profit organisation which relies largely on public funding and support from stakeholders to achieve our objectives and mission. Being an Institution of Public Character, BCF upholds a high standard of integrity to maintain the trust and confidence of the public, members and volunteers.

This Policy provides a framework to promote responsible and secure whistleblowing, and intends to foster and maintain a culture of openness, accountability and integrity within BCF, and an environment where members, staff, volunteers and third parties can report unethical and corrupt practices, in good faith, without the fear of adverse consequences, reprisal or retaliation. BCF does not tolerate any malpractice, impropriety, statutory non-compliance or wrongdoing by members, volunteers, staff or service providers in the course of their work.

In line with the above, this Policy is intended to provide a channel for the reporting of actual or suspected wrong-doings/irregularities committed by any staff, member, volunteer (including any member of the Executive Committee (“**EXCO**”) or subcommittee member of BCF), service provider and other stakeholder in connection with the programmes, activities and operations of BCF and any work carried out or actions taken by such persons purportedly for and on behalf of BCF. The policy will enable and facilitate follow-up, investigation and corrective action by BCF and also provide assurance that the whistle blower will be protected from reprisals for whistleblowing in good faith.

Reporting Practices and Procedures

- All Staff are encouraged to report to their supervisor or the General Manager all incidences of:
 - Fraud which includes falsification, forgery or fraudulent alteration of documents (cheques, bank drafts, contracts, computer data), the submission of fictitious or doctored documents, or the making of false statements
 - Theft, misappropriation or misuse of money or assets belonging to BCF
 - Fraudulent financial reporting and questionable accounting practices
 - Corruption and bribery
 - A material violation of the laws and regulations of Singapore
 - Wanton disregard or knowing or repeated breaches of BCF’s Constitution, or BCF’s written policies or procedures
 - Conduct that may cause financial or non-financial loss or harm (including loss of reputation and/or endangerment to health and safety) to BCF or its members, volunteers, stakeholders or any member of the public
 - Acts of retaliation by any staff, constituting assault, intimidation or harassment, or any actions that may result in discrimination or unfair treatment, against the Whistleblower (as defined below) or any other staff who has made an allegation or assisted in any investigation or an allegation.

- The Whistleblower can send the report by email to whistleblowing@bcf.org.sg.

- Where any such report or complaint is made to any other staff, that staff shall provide full details of such report / complaint to the Chairman of the Audit & Risk Management Subcommittee (the “**Receiving Officer**”). The Receiving Officer to whom any report / complaint is made shall consider such report / complaint and take such actions as are mandated in this Policy.

- When making a report/complaint, the Whistleblower should provide as much details as possible including:
 - Description of the alleged act or omission;
 - Description of the person(s) involved in the act or omission;
 - The time and place of such act or omission; and
 - Details of supporting documents, witnesses or other evidence.

- The Whistleblower is encouraged to identify himself/herself and provide his/her contact details.

- Any report made by a complainant should ensure that all claims of wrong-doing are made in good faith. A “**Whistleblower**” is a person who reports an activity he/she believes to be illegal, dishonest or unethical, should do so in good faith, truly believing that the report is genuine and free of personal biases. For this purpose:
 - Good faith embodies making the report without malice or consideration of personal benefit
 - The burden of proof does not lie with the Whistleblower

- After making the report/complaint, the Whistleblower must refrain from taking any action unilaterally or making further investigation of the incident, confrontation of the accused or engage in further discussion of the incident with any other persons. All investigation must be left to the Receiving Officer and the Review Committee in accordance with this Policy.

Scope and Responsibilities

- The Receiving Officer to whom a report / complaint is made is responsible for reviewing the relevant report or complaint pursuant to this Policy.

- If any such report or complaint is determined by the Receiving Officer to be valid and substantiated, the Receiving Officer shall submit a written report to the Review Committee as soon as practicable.

- Notwithstanding anything to the contrary in this Policy, where the subject of any report or complaint is, the Receiving Officer, the Whistleblower should submit the report / complaint directly to the President. In such circumstances, the President shall determine if the report or complaint is valid and substantiated, and may direct the Review Committee to review the report / complaint and take such actions as are mandated in this Policy.

- The Review Committee comprises the President, Vice President, Secretary, Chairman of Audit & Risk Management Sub-Committee and Chairman of Human Resources Sub-Committee. If the report or complaint in question involves an existing member of the Review Committee, that member will be excused from participation in the review in question. The President may co-opt any other EXCO member into the Review Committee at any time,

whether on a temporary or permanent basis, to replace the excused member or for any reason whatsoever.

- All staff in BCF, whether named as a suspect or witness to any offense have a duty to cooperate with investigations whether conducted by a Receiving Officer, the President or the Review Committee. Participants in any investigation should respect the confidentiality of the process and not spread rumours or gossip regarding an ongoing investigation. Disciplinary action may be taken against any person who does not comply with these requirements.

Actions/Investigations

- Every report and complaint must be investigated and a conclusion must be drawn whether by the Receiving Officer, the President or the Review Committee. All investigations must be handled confidentially and promptly, and in an independent and unbiased manner both in fact and appearance.
- The Receiving Officer or the President receiving a report / complaint will conduct a preliminary assessment of the report or complaint based on the information provided. If there is sufficient evidence to conclude that there is a prima facie case, the Receiving Officer / President will submit a report to the Review Committee to carry out a thorough investigation as deemed appropriate by the Review Committee, in order to reach a conclusion.
- Where the Receiving Officer or the President forms a view following preliminary assessment that there is no merit to the report or complaint, such conclusion must be communicated to the Review Committee. The Review Committee shall have the right to determine that a report or complaint requires further action in accordance with this Policy notwithstanding a preliminary determination of no merit by the Receiving Officer / President.
- Where the Receiving Officer or the President submits a written report to the Review Committee ("**Preliminary Report**"), a meeting shall be convened within 2 weeks for the purpose of facilitating the review and determination by the Review Committee. The Review Committee may direct any staff, or any division or department within the BCF to assist to administer the review, investigation or determination. The Receiving Officer or the President (or such BCF staff to whom the task has been delegated) shall keep the complainant updated of the general progress of investigations to assure the complainant of the progress of the matter.
- The Receiving Officer, the President or the Review Committee may request any additional documentation or verbal statements from the complainant or any other persons as may be legitimately required for appropriate fact finding. Insofar as possible, the confidentiality of the investigation process will be maintained.
- Details of or relating to the alleged complaint may need to be disclosed to other staff or third parties in order to conduct a thorough investigation, to comply with the law or to provide accused individuals their legal rights of defence. Additionally, if required by the Receiving Officer, the President or the Review Committee, the person who files the report/complaint or who is a witness to the alleged action or omission may be invited to join the hearing to

present his or her report/complaint, evidence or testimony in person to the Receiving Officer, the President or the Review Committee.

- All investigation reports produced and any decisions and/or actions proposed by the Review Committee will be presented to EXCO for approval or ratification. The Review Committee may recommend effective remedial actions to be taken, which include referral to the appropriate external regulatory or other authorities, commensurate with the severity of the offense.

Protection to Whistleblowers

- BCF prohibits discrimination, retaliation or harassment of any kind against a Whistleblower who submits a report or complaint. If a Whistleblower believes that he or she is being subjected to discrimination, retaliation or harassment for having made a report or complaint under this Policy, he or she should immediately report those facts to the President, who is required to report the same to the Review Committee.
- Any compliant, allegation or disclosure that is found to have been made by any staff maliciously or with knowledge that it was false shall be treated as a serious disciplinary offense.

Modification and Updates

- This Policy has been approved by the EXCO, and BCF reserves the right to modify this Policy with approval of EXCO as and when deemed necessary.

The General Manager will be responsible for reviewing this Policy from time to time to update and modify the same for suitability for BCF's purposes.