



CODE OF CONDUCT
OF
BREAST CANCER
FOUNDATION
(Members and Volunteers)

BREAST CANCER FOUNDATION CODE OF CONDUCT FOR MEMBERS AND VOLUNTEERS

1. GENERAL INTRODUCTION TO THE CODE OF CONDUCT FOR MEMBERS AND VOLUNTEERS

1.1 OBJECTIVES OF THE CODE

1.1.1 This Code aims to provide all members and volunteers with the basic principles with which each member and volunteer shall comply when acting on behalf of the Society and to ensure that all members and volunteers understand the standard of conduct required for all Society-related activities. The authority and creditability of the Society is measured, among other things, by the way each member and volunteer, be it a collective or individual subject, behaves when dealing with society and its various elements.

1.1.2 The status of members and volunteers implies certain obligations towards the Society of which they bear the name and to which they declare adherence, including standards of conduct. Members and volunteers therefore shall agree to meet a number of requirements conducive when carrying out their duties and interactions to ensuring a fruitful collaboration in furtherance of the Society's objects.

1.1.3 In joining the Society, members and volunteers undertake to abide by this Code.

1.2 DEFINITION OF MEMBERS AND VOLUNTEERS

1.2.1 Members

Membership is open to all breast cancer patients, survivors, caregivers of breast cancer patients, and also to all persons who are interested in furthering and supporting the above objects of the Society. "Person" shall mean an individual, corporation, society, firm, company or association, or any other legal or commercial entity or undertaking. Individual members must be above 18 years of age.

1.2.2 Volunteers

Volunteers are persons who contribute in any way to the support of the Society including by offering their services, time or assistance, to the development and to the public presence and influence of the Society. They act on a voluntary and non-remunerative basis. Their support is moral, financial or consists of voluntary work or expertise.

2. DUTIES OF MEMBERS AND VOLUNTEERS

2.1 CONDUCT OF MEMBERS AND VOLUNTEERS

2.1.1 Members and volunteers are expected at all times to:

- (a) be present for their duties and to adhere to the stipulated date(s) and time of their duties;
- (b) inform their volunteer liaison / supervisor as early as possible if they are unable to be present for their duties;
- (c) use the resources, property, information or funds provided by the Society solely for authorised uses and the purposes of accomplishing his/her duties as a member/ volunteer;
- (d) carry out their duties and act in good faith, in a safe and responsible manner, and with skill and diligence, in the best interests of the Society;

- (e) speak and act in a respectful and professional manner in all their dealings and communications with others;
- (f) be appropriately dressed for their duties;
- (g) be responsible for their own personal belongings;
- (h) abide by all applicable Society policies, procedures and codes of conduct;
- (i) maintain confidentiality of all data and information obtained;
- (j) observe all safety procedures;
- (k) inform and seek permission from the Society before making any donations and/or gifts while being a member/ volunteer for the Society;
- (l) where such volunteering relates to fundraising, observe all relevant guidelines, rules and regulations, legislation, codes of governance and best practices relating to fundraising; and
- (m) notify the Society if he/she chooses to terminate his/her membership/ volunteer relationship with the Society.

2.1.2 Members and volunteers are expected at all times not to:

- (a) act in any way that will incur any liability to the Society or bring into disrepute the Society and its name;
- (b) seek or accept rewards, benefits or gifts without permission from the Society;
- (c) engage in any activity that may bring harm (e.g. physical or mental) to another person or property;
- (d) be under the influence of alcohol and non-prescription drugs while under duty;
- (e) falsify or change any documents or records;
- (f) post any photographs, videos, reports, advertisement, promotional material on social media or any other media platform without obtaining authorisation from the Society and persons whom personal data is being collected;
- (g) act as a spokesperson for the Society unless prior permission or authority has been given;
- (h) use their involvement with the Society to promote their own personal interests, beliefs or practices, which have either actual, perceived or potential conflicts with the duties to the Society where these are inconsistent with the vision and mission of the Society;
- (i) make any statement or representation for and on behalf of the Society or the people within the Society, knowing it to be false or without regard as to the validity or falseness of the statement; and
- (j) enter negotiations or make any commitments regarding the Society related activities, including sponsorship and rights.

2.2 CODE OF ETHICS

2.2.1 Members and volunteers must:

- (a) Proactively promote ethical behaviour in conducting the activities of the Society.
- (b) Deal fairly with the Society's supporters, donors, suppliers, competitors, volunteers, and employees.
- (c) Provide constituents with information that is accurate, completely objective, relevant, timely, and understandable.
- (d) Comply with applicable government laws, rules and regulations.
- (e) Maintain the confidentiality of information entrusted to them by the Society except when authorised or otherwise legally obligated to disclose in accordance with Paragraph 5 below.
- (f) Accept responsibility for preventing, detecting, and reporting all manner of Fraud (as defined under Paragraph 4 below).
- (g) Be honest and ethical in their conduct, including ethical handling of actual or apparent conflicts of interest between personal and professional relationships.
- (h) Protect and ensure the proper use of the Society's assets.
- (i) Prohibit improper or fraudulent influence over the external auditor.

3. **WHISTLEBLOWING POLICY**

- 3.1 Procedures in relation to whistle blowing policies, including reporting practice and procedures, investigation procedures and protection to whistle blowers shall be in accordance with the Society's Whistleblowing Policy found in **Appendix 1**.

4. **FRAUD**

4.1 ZERO TOLERANCE POLICY

4.1.1 The Society maintains a zero tolerance policy towards fraud. This policy applies to all members and volunteers.

4.1.2 The Society defines fraud as intentional deception, misappropriation of resources or manipulation of data or information to the advantage or disadvantage of a person or entity ("**Fraud**"). Some examples of Fraud include:

- (a) Falsification of financial results;
- (b) Falsification of expenses, invoices and quotations;
- (c) Alteration or falsification of records;
- (d) Failure to account for monies collected; or
- (e) Knowingly providing false information on job applications or in relation to requests for funding.

4.2 FRAUD DETECTION AND REPORTING

- 4.2.1 The Society is committed to put in place checks and balances to deter and prevent Fraud.
- 4.2.2 All members and volunteers have a duty to report concerns, which they may have, or reliable information provided to them, about possible fraudulent activity of any Committee Member, Sub-Committee, Staff, vendor, supplier, corporate partners or any other party associated with the Society.
- 4.2.3 Given the seriousness of allegations of Fraud and that persons who are of more seniority in rank or hierarchy could be involved in such allegations; several independent reporting avenues shall be made available to ensure confidentiality and impartiality.
- 4.2.4 Members and volunteers may report their concerns to any of the following, as appropriate:-
- (a) Chairman;
 - (b) Secretary; or
 - (c) Treasurer.
- 4.2.5 All reports of Fraud will be taken seriously and shall be investigated accordingly. The person reporting shall be obliged to identify himself or herself to any of the Committee Members before investigations can proceed. The Society will not act on an anonymous allegation of Fraud.
- 4.2.6 The identity of the person reporting shall be kept confidential, within the limits allowed by law. The Society does not tolerate any reprisals or retaliations against the person who file such reports if the person has acted reasonably and in good faith and has co-operated in the Society's investigations. The Society, however, cannot protect persons who file reports which they know to be false and without reasonable belief in the accuracy of the information. Persons who maliciously fabricate their reports and feedback shall be severely dealt with.
- 4.2.7 The Committee shall be informed of any investigation resulting in confirmation of a fraudulent act. If deemed necessary, the Society shall notify and fully co-operate with the appropriate law enforcement agency in any investigation.

5. CONFIDENTIAL INFORMATION

5.1 DEFINITIONS

- 5.1.1 "**Confidential Information**" shall mean all information (whether recorded or not and in whatever form or media) relating to all or any part of the business, property, assets, technology, activities, services, financial affairs, management and administration of the Society, including information relating to the Society's employees, donors, business partners, clients, suppliers and any third party dealing with the Society. For the avoidance of doubt, Confidential Information includes, without limitation, Personal Data and any information relating to donations and/or gifts, and further includes, without limitation, all data, analyses, reports and other derivative information or material created in the course of, or as a result of, volunteering and other philanthropic activities with or for the Society, or as a result of having access to or otherwise obtaining confidential information of the Society.
- 5.1.2 "**Personal Data**" shall have the meaning ascribed to it in the Personal Data Protection Act 2012 ("**PDPA**") (as the same may be amended and/or revised thereto from time to time). For the avoidance of doubt, photographs, images and videos are considered Personal Data and members and volunteers who wish to take photographs or videos with any individuals must first seek consent from such individuals.
- 5.1.3 "**Data Subject**" refers to any person whose personal data is being collected, held or processed.

5.2 CONFIDENTIALITY POLICY

5.2.1 In the course of carrying out their member or volunteer duties, members and volunteers may collect, have access to, be exposed to or otherwise obtain Confidential Information. Notwithstanding the foregoing, the Society shall have the absolute discretion to decide the type of Confidential Information it wishes to disclose to the members and volunteers.

5.2.2 Members and volunteers undertake not to at any time disclose Confidential Information except as permitted below:

- (a) written consent for the disclosure has been obtained from the Data Subject;
- (b) disclose Confidential Information only on a need-to-know basis to the extent required to carry out their duties to the Society;
- (c) Confidential Information obtained is not under any obligations of confidentiality with respect to such information; and
- (d) disclosure is required by law, a court of competent jurisdiction or any governmental or regulatory authority;

5.2.3 Confidential Information does not include information which is already in, or which subsequently comes into, the public domain provided always that it was not entered into the public domain as a result of its wrongful disclosure to any person.

5.2.4 Members and volunteers shall ensure that all Confidential Information:

- (a) are held and kept in strictest confidence;
- (b) is only collected with the prior written consent of the Data Subject;
- (c) is only used (directly or indirectly):
 - (i) in accordance with the instructions of the Society;
 - (ii) in accordance with the purposes for which the Society and/or the Data Subject disclosed the Confidential Information;
 - (iii) for purposes which the Data Subject has been notified of and has given his/her consent to; and
 - (iv) for purposes which are reasonably necessary to enable the member/ volunteer to fulfil his/her voluntary responsibilities with the Society;
- (d) is only disclosed to third parties with the prior written consent of the Data Subject and the prior written approval of the Society, and if such approval is granted, is only transferred upon such additional terms and conditions which the Society and/or the Data Subject may impose for such transfer;
- (e) is only transferred to another country with the prior written consent of the Data Subject and the prior written approval of the Society, and if such approval is granted, is only transferred upon such additional terms and conditions which the Society and/or the Data Subject may impose for such transfer;
- (f) is not copied or reproduced in any form whatsoever by the member/ volunteer, save as may be necessary for the purposes of accomplishing his/her duties as a member/ volunteer;

- (g) is protected against accidental/unlawful/unauthorised destruction, loss, alteration, disclosure, access, misappropriation, misuse and all other unlawful forms of processing by another person, including, but not limited to, taking steps to ensure that the Confidential Information;
 - (i) is properly secured and stored in a manner which does not permit unauthorised access including physically restricting the location and use of such Confidential Information to areas over which the member/ volunteer has control and storing such Confidential Information in a manner which does not permit unauthorised access); and
 - (ii) is not stored in data clouds or such services;
- (h) is not retained or stored for longer than necessary for:
 - (i) the purposes of accomplishing his/her duties as a member/ volunteer and performance of their obligations herein; and/or
 - (ii) the purposes for which the Society disclosed the Confidential Information; and
- (i) is promptly returned to the Society or destroyed or permanently deleted by the member/ volunteer (with no copy retained and written confirmation to the Society of the same) upon the request of the Society at any time and/or after the purpose of retaining the information is no longer necessary to enable the member/ volunteer to fulfil his/her responsibilities with the Society.

5.2.5 Members and volunteers shall immediately give notice in writing to the Society as soon as they become aware of, or reasonably suspect, that any of the events set out in Paragraph 5.2.4(g) above has occurred, and take all the steps necessary to remedy the event and prevent its re-occurrence.

5.2.6 Volunteers shall comply with the PDPA, Societies Act, and Charities Act (Cap. 37) and all subsidiary legislation related thereto with regard to any and all Personal Data and donor information that they may have access to or otherwise obtain.

6. CONFLICT OF INTEREST

6.1 DISCLOSURE POLICIES AND PROCEDURES

6.1.1 Members and volunteers are expected to avoid situations which may have conflict of interest with the Society (e.g. other commitments, roles in other organisations). If any potential area of conflict arises, members and volunteers are to consult their volunteer liaison / supervisor or relevant Committee Member.

6.1.2 Disclosure policies and procedures in relation to declaration of conflict of interest and abstention from decision making shall be in accordance with the Society's Avoidance of Conflict of Interest Policy found in Appendix 2.

7. COMPLAINTS OR GRIEVANCES AGAINST MISCONDUCT

7.1 Complaints or Grievances

- 7.1.1 Any complaint as to the conduct of any Committee Member, Staff, member or volunteer must be lodged in the prescribed Complaint Form available on the Society's website, signed by the Complainant and sent to the Chairperson of the Human Resource Sub-Committee at HRComm.Chair@bcf.org.sg. The Complaint Form must set out particulars of the incident(s) including names of the Committee Member, Staff, member or volunteer involved, and any documentary evidence or witnesses present together with the date and time of the incident(s).
- 7.1.2 In the situation where a complaint is made in the nature of whistleblowing, the Secretary shall decide whether Rule 7 or the Society's Whistleblowing Policy found in **Appendix 1** applies. If the complaint is made against the Secretary, the President shall decide in consultation with the Vice-President.

7.2 Communication and Transparency

When a Committee Member receives a complaint or grievance, the Committee Member shall forward the complaint or grievance to all Committee Members (except any Committee Member(s) whom the complaint is lodged against) within three (3) days of receipt of the complaint or grievance for the other Committee Members' information and comments, if any.

7.3 Formal Investigation Process and Outcomes

- 7.3.1 The Human Resource Sub-Committee shall investigate all complaints lodged pursuant to paragraph 7.1 above in compliance with the Society's policies and procedures in respect of investigation of complaints, which shall be annexed to the Complaint Form. During the course of investigation, the person subject to the complaint ("**Complainee**") may be suspended from their duties at the discretion of the Human Resource Sub-Committee.
- 7.3.2 Upon completion of investigation, the Human Resource Sub-Committee shall inform the Complainant and Complainee of the outcome of the investigation and proceed with the following course of action:
- (a) If no misconduct is found on the part of the Complainee, the investigation shall be closed.
 - (b) If misconduct is found on the part of the Complainee, the Complainee shall be given the opportunity to present their case during a Disciplinary Hearing which shall be fixed by the Human Resource Sub-Committee within thirty (30) days from the date the Complainee is informed of the investigation outcome.

7.4 Disciplinary Hearing

- 7.4.1 The Disciplinary Hearing shall comprise three (3) Committee Members who shall be selected by the Committee to ensure that there is no bias against the Complainee. The investigation and decision-making process must be in an objective and fair manner, and its result should follow the facts uncovered and cannot be preordained.
- 7.4.2 The Complainee shall be given at least two (2) weeks advance notice of the date fixed for the Disciplinary Hearing. It is compulsory for the Complainee to attend the Disciplinary Hearing on the fixed date unless written notice is given at least three (3) days in advance citing valid reasons for their inability to attend.
- 7.4.3 The Complainee shall be given the opportunity to present their case during the Disciplinary Hearing either by written or oral submissions, answer questions in relation to the allegation and

call relevant witnesses (who must be given sufficient notice prior to the Disciplinary Hearing.

7.4.4 If a Complainee fails to attend the Disciplinary Hearing without giving due notice pursuant to paragraph 7.4.2 above, the Disciplinary Committee will proceed with the hearing in their absence based on written submissions and supporting documents, if any. The decision made by a simple majority of the Disciplinary Committee will be final and binding.

7.5 Appeal Process

7.5.1 Any Committee Member, Staff, member or volunteer who is dissatisfied with the decision in relation to a complaint or grievance may appeal to the Appeals Board with written submissions and supporting documents on the grounds of appeal:

- (a) if no misconduct is found pursuant to paragraph 7.3.2(a) above, within thirty (30) days of the completion of investigation; or
- (b) if misconduct is found pursuant to paragraph 7.3.2(b) above, within thirty (30) days from the date of the Disciplinary Hearing.

7.5.2 The Appeals Board shall be appointed by the President and shall comprise three (3) Committee Members other than the three (3) Committee Members who formed the Disciplinary Committee. If the President is the Complainee, the Appeals Board shall be appointed by the Vice-President in consultation with the Secretary.

7.5.3 The Appeals Board shall review the written submissions and supporting documents and shall fix a date for the Appeal Boards hearing as soon as practicable. Sufficient notice of the Appeals Board hearing must be given to the appellant that their presence is required at the Appeals Board hearing. If the appellant fails to appear at the Appeal Boards hearing without a valid reason, the Appeals Board will proceed with the appeal in their absence based on written submissions and supporting documents, if any. The decision made by the Appeals Board will be final and binding.

7.6 Subject to the Constitution

Nothing in these provisions shall limit or supersede the terms of the Constitution including but not limited to Rule 7.1 and Rule 16.

8. **PUBLIC RELATIONS AND MEDIA COMMUNICATIONS**

8.1 Members and volunteers immediately refer to the Advocacy and Communications Sub-Committee all media queries and requests pertaining to the Society and its programmes and schemes from any media agencies, including, but not limited to the broadcast, electronic, print and online media, wire services and mass circulation publications.

8.2 Members and volunteers shall not engage in any form of communication with the media, including writing reports for the media, accepting interviews and / or writing letters to the forum pages, in the capacity of a member or volunteer, without prior discussion with the Advocacy and Communications Sub-Committee.

9. **PROPERTY AND INFORMATION**

9.1 Members and volunteers are expected to protect the Society's property at all times; including cash, equipment, records, employee, and customer information. Members and volunteers are also required to maintain confidentiality regarding the Society's records, and employee and customer information in

compliance with Paragraph 5 above.

10. **NON-DISCRIMINATION POLICY**

10.1 It is the Society's policy that the volunteer, membership and staff structures and all programs and activities of the Society shall be designed and conducted without regard to race, religion, national origin, sex, age, disability or other non-merit criteria.

11. **ADMINISTRATION OF THIS CODE**

11.1 AMENDMENTS

11.1.1 The Society may amend this Code from time to time unless it is reversed at a General Meeting or Extraordinary General Meeting of members pursuant to Rule 7.1 and Rule 15 of the Society's Constitution.

11.2 PROMULGATION OF OTHER POLICIES AND GUIDELINES

11.2.1 The Society may introduce or promulgate new guidelines and policies from time to time in line with the practices set out in this Code.

11.3 BREACH OF CODE

11.3.1 It shall be a breach of the Code for any member or volunteer not to report any violation of the Code that comes to his or her knowledge.

Apart from the reporting procedures for Fraud (as set out in Paragraph 4 above), all members and volunteers shall report any concern or information they may have concerning a possible violation of the Code to the Secretary.

11.3.2 All reports of violations of the Code shall be taken seriously and shall be investigated accordingly. The person reporting must, however, identify himself or herself before investigations can proceed. The Society will not act on an anonymous allegation of violation of the Code.

11.3.3 All members and volunteers are responsible for fully understanding and complying with the Code, including any updates or changes that may be made to the Code from time to time. They shall be asked to certify that they have read, understood and would comply with the Code. This procedure may be undertaken on a periodic basis to be determined by the Committee or when there are updates to the Code.

Appendix 1 – Whistleblowing Policy

Appendix 2 - Avoidance of Conflict of Interest Policy

Appendix 1 : Whistleblowing Policy

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 wrongdoings/irregularities committed by any staff, member, volunteer (including any member of the Committee or Sub-Committee 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 Sub-committee (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 Secretary. In such circumstances, the Secretary 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 Committee 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 Secretary 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 Secretary 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 Secretary 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 / Secretary 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 Secretary 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 / Secretary.
- Where the Receiving Officer or the Secretary 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 Secretary (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 Secretary 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 Secretary 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 Secretary or the Review Committee.
- All investigation reports produced and any decisions and/or actions proposed by the Review Committee will be presented to Committee 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 Secretary, who is required to report the same to the Review Committee.
- Any complaint, 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 Committee, and BCF reserves the right to modify this Policy with approval of Committee 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.

Appendix 2: Avoidance of Conflict of Interest Policy

AVOIDANCE OF CONFLICT OF INTEREST POLICY

1. Statement of Purpose and Authority

Breast Cancer Foundation's (BCF) basic policy on avoidance of conflict of interest rests on three premises:

- a. Understanding what is 'Conflict of Interest';
- b. Declaration of Conflict of Interest; and
- c. Abstention from decision making where a Conflict of Interest has been declared or exists.

2. Definition of 'Conflict of Interest'

An operational definition of conflict of interest is when an individual is aware of "any interest in a transaction or arrangement that will affect his/her professional judgment to obtain the best value for BCF or to protect the interests of BCF."

Some of the more obvious conflicts of interest relate to:

- Procurement of goods or services (Contract with vendors);
- Hiring and personnel management pertaining to close relationship¹ with current board/committee members or decision makers;
- Provision of services or subsidies;
- Vested interest² in other organizations that have dealings/relationship with BCF;
- Interest in joint ventures;
- Major donors / representatives from major donors.

3. Declaration of Conflict of Interests

All key staff and Committee of BCF must acknowledge that they understand the definition of 'Conflict of Interests' as above and they acknowledge that they will subscribe to the 'Avoidance of Conflict of Interest' Policy of BCF. This includes a declaration whenever there is a conflict or potential conflict and the individual will abstain from all decisions regarding that conflict of interest.

Annex A provides an acknowledgement of the 'Conflict of Interest' notice served to individual at the beginning of each fiscal year. Annex B contains the 'Declaration of Conflict of Interest' at the end of each fiscal year.

Members must declare the existence of a conflict of interest as soon as the individual becomes aware of the situation. Annex C contains a sample copy of the declaration.

To aid the members in discharging their responsibility in relation to the existence of possible conflict of interest, members are required to declare their membership or significant involvement or interests in organizations that may pose a possible conflict of interest to BCF. The declaration is found in Annex D.

4. Abstention from Decision Making

Once an individual is aware of the existence of a conflict of interest, he/she must abstain from the decision-making process pertaining to the possible conflict of interest. This means the individual should not influence the decision process. This does not necessary prevent the individual from providing

¹"Close relationship" refers to spouse, children, parents and siblings of the subject person. Children include step-children and adopted children.

²"Vested interest" is defined as a strong personal interest which a person has in a matter as he might benefit from it. It can also include a special interest in protecting and promoting that which is to one's own personal advantage.



relevant and expert knowledge on the issue or participate in the discussion but he/she should only do so with wisdom so as not to influence the decision.

ANNEX A

ACKNOWLEDGEMENT OF NOTICE TO DISCLOSE CONFLICT OF INTERESTS

An operational definition of conflict of interest is when an individual is aware of “any interest in a transaction or arrangement that will affect his/her professional judgment to obtain the best value for BCF or to protect the interests of the BCF.”

Some of the more obvious conflicts of interest relate to:

- Procurement of goods or services (Contract with vendors);
- Hiring and personnel management pertaining to close relationship with current board/committee members or decision-makers;
- Provision of services or subsidies;
- Vested interest in other organizations that have dealings/relationship with BCF;
- Interest in joint ventures;
- Vested interest in major donors / representatives from major donors.

I, _____ NRIC No: _____, acknowledge that I have been duly served with a notice concerning the definition of conflicts of interest arising from my relationship with BCF for the fiscal year beginning _____.

The notice of conflicts of interest states that as a _____ of BCF, I have a fiduciary duty to protect the interests of BCF and will not undertake, participate, abet or otherwise any course of actions that will undermine or jeopardize the financial well-being and good state of BCF.

In the event when there are transactions, actions, relationships, arrangements, decisions or events that may possibly lead to a conflict of interest, I hereby undertake to:

- a. Declare my interest in the transactions, actions, relationships, arrangements, decisions or events; and
- b. Abstain from all decision-making process, directly or indirectly, pertaining to the matter.

Finally, I agree that at the end of the fiscal year, I will sign a statement detailing and declaring any arrangements, transactions or relationships between myself and BCF that may raise concerns of conflict of interest notwithstanding the fact that I have declared those transactions, actions, relationships or arrangements during the year.

I fully understand that this statement is signed in good faith and to the best of my knowledge so as to strengthen the corporate governance and accountability of BCF as a charity.

Name and Signature

Date

ANNEX B ANNUAL DECLARATION OF CONFLICT OF INTERESTS

I, _____, NRIC No: _____, as a _____ of BCF, declare that in the course of the financial year of BCF for the fiscal year ending _____.

There are no transactions, actions, relationships, arrangements, decisions or events between myself and BCF that resulted in any conflict of interest.

The following transactions, actions, relationships, arrangements, decisions or events had occurred between myself and BCF and had been duly declared as per the notice of conflict of interest served earlier in the year. *(use additional inserts if needed)*

Date and Transaction	Date of Declaration	Amount (if applicable)

The following transactions, actions, relationships, arrangements, decisions or events had occurred between myself and BCF but had not been duly declared as per the notice of conflict of interest served earlier in the year. *(use additional inserts if needed)*

Date and Transaction	Date of Declaration	Amount (if applicable)

I fully understand that this statement is signed in good faith and to the best of my knowledge so as to strengthen the corporate governance and accountability of BCF as a charity.

Name and Signature

Date



**ANNEX C
DECLARATION OF CONFLICT OF INTEREST**

I, _____, NRIC No: _____, as
a _____ of BCF, am serving notice for possible conflict of interest arising from my
relationship with _____. I henceforth abstain from all decision pertaining to the
abovenamed person.

Description of the Interest

Name and Signature

Date

Notice Served to:



**ANNEX D
DECLARATION OF INTEREST IN OTHER ORGANISATIONS**

I, _____, NRIC No: _____, as a _____ of BCF, declare that I am a key staff or director of the following organisations for the fiscal year beginning _____.

Name of Organisation	Position Held	Date

I fully understand that this statement is signed in good faith and to the best of my knowledge so as to strengthen the corporate governance and accountability of BCF as a charity.

Name and Signature

Date