SINGAPORE CRICKET CLUB

WHISTLE BLOWING REPORTING POLICY & PROCEDURE

SCOPE: This policy aims to provide an avenue for members/employees to raise concerns, in confidence, about possible violations. The management at Singapore Cricket Club (SCC) is committed to provide a high standard of compliance with accounting, financial reporting, internal controls, corporate governance and auditing requirements and any legislation.

1) **OBJECTIVES**

a) Deter from wrongdoings and to promote standards of good corporate practices.
b) Provision of proper avenues for members/employees to raise concerns about actual or suspected improprieties in matters of financial reporting or other matters and receive feedback on any action taken.
c) Give members/employees the assurance that they will be protected from reprisals or victimization for whistleblowing in good faith.

2) REPORTABLE INCIDENTS

Below are the concerns covered by this Policy include, but are not limited to, the following :

a) Forgery
b) Misappropriation of Club's funds and classified documents
c) Abuse and misrepresentation of power and authority
d) Failure to comply with laws and regulations
e) Discrimination on the basis of gender, race, disabilities
f) Harassment
g) Corruption and bribery
h) Theft

The above list is intended to give an indication of the kind of conduct which might be considered as "wrong-doing". In case of doubt, the "whistle blower" is an employee of SCC, he/she should seek to speak to his or her immediate superior or follow the procedure for reporting under this Policy.

3) HOW TO RAISE A CONCERN

All concerns must be raised in writing in a Form (Annex A) provided. Members/Employees who wish to make a written report should use the following format :

- background and history of the concern (giving relevant dates);
- reason why the member/employee is particularly concerned about the situation.

It should be noted that often the earlier a concern is expressed the easier it is to take appropriate action.

Whistleblowers are strongly encouraged to provide their names and contact numbers to facilitate investigations. Further clarifications are often needed and helpful in investigations into the feedback/complaints. The ability to investigate depends on the quality and adequacy of the information provided by the Whistleblower. Subject to Singapore laws and Club's regulations, SCC will protect the confidentiality of the Whistleblower.

4) CHANNEL OF REPORTING

Individuals are recommended to identify themselves and all reports should be sent directly to the Club President and the Chairperson of FSC via email at whistleblower@scc.org.sg or to be written directly to the President. The President will decide on the course of action depending on the nature of the concern.

5) MANAGEMENT RESPONSE

Within five (5) working days of a concern being raised, the member/employee raising the concern will be informed :

- acknowledging that the concern has been received;
- indicating how it proposes to deal with the matter; and
- giving an estimate of how long it will take to provide a final response.

If it is impossible for initial inquiries to be completed within ten working days, the situation will be explained in the letter of acknowledgement. Where a decision is made that no investigation will take place, the reasons for this will be provided.

6) SAFEGUARDS

The management of SCC will protect the identity of any member/employee who raises a concern and does not want his/her name to be disclosed. However, the investigation process may reveal the source of the information and a statement by the member/employee reporting the concern may be required as part of the evidence.

If the results of an investigation show that the Whistleblower acted maliciously or did not act in good faith or submitted a feedback/complaint which he/she knew to be false, or without a reasonable belief in the truth and accuracy of the information, the management of SCC shall consider to take appropriate actions against the Whistleblower.

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ANNEX A

Confidential

Report of Whistleblowing Case

Name of Member / Staff Making the Report : _____

Identity will be kept strictly confidential as stated in Point 6 of the Whistle Blowing Policy.

Member's Particulars		Staff's Particulars	
Name	: _____	Name	: _____
Membership No.	: _____	Designation	: _____
		Department	: _____

Description of Case *(Describe the suspected improper activity or misconduct and how you know about it. Specify who, what, when, where and how. Provide evidence where available.)*

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