

905-8 WHISTLE-BLOWING POLICY

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1. Our Objective and Commitment

- 1.1. To provide a formal process to raise and handle whistle-blowing concerns and a framework to support the process.
- 1.2. To encourage Council Members, employees, members of the congregation, vendors and members of the public, to report improper, unethical and inappropriate behaviour in the Organisation.
- 1.3. To assure that all reports will be properly addressed, treated with confidentiality and there are adequate whistle-blower safeguards from reprisal in any form.
- 1.4. To promote and develop a culture of accountability, integrity and transparency.

The Organisation aims to encourage Council Members, employees, members of the congregation, vendors and members of the public, to report concerns on misconduct or malpractice (i.e. improper, illegal or negligent behaviour) in good faith, without malice or personal benefit. However, grievances of a personal nature (e.g. bullying, harassment, disagreements, discrimination among employees etc) are not a whistle-blowing concern.

2. What Types of Whistle-Blowing Concerns are Covered

Examples of the type of matters that should be reported include but are not limited to the following:

- 2.1. Fraud (e.g. theft, corruption, misrepresentation, bribery, kickback or embezzlement).
- 2.2. Failure to comply with any legal or regulatory obligation;
- 2.3. Threats to the health or safety of employees and/or the public;
- 2.4. Financial irregularity;
- 2.5. Abuse of power;
- 2.6. Breach of Code of Conduct or company policies;
- 2.7. A deliberate attempt to cover up any of the above.

3. Responsibilities of the Whistle-Blower

- 3.1. Whistle-blower must disclose the information in good faith.
- 3.2. Whistle-blower must ensure the information is genuine and can be substantiated with proper evidence.
- 3.3. Employee must not act maliciously or make false allegations. If an employee deliberately makes a false and malicious allegation, disciplinary action will be taken against the employee on a case-by-case basis. Hence, employees are reminded not to abuse the policy but to raise genuine concerns.

4. Confidentiality & Protection

- 4.1. The Organisation respects the confidentiality of the whistle-blower and is committed to preserving confidentiality by keeping the report and case information secure and accessible only to designated persons. Aligned with the spirit of confidentiality, the Organisation allows anonymous reporting.

- 4.2. If necessary or lawful circumstances dictate the disclosure of the whistle-blower's identity, the Organisation will seek the whistle-blower's consent.
- 4.3. The Organisation does not condone any reprisal, discrimination or harassment against whistle-blowers who report in good faith. It is committed to protecting whistle-blowers from threats to employment and any other threats of retaliatory action. Disciplinary actions will be taken against those who retaliate, harass or discriminate against whistle-blowers.

5. How to Raise a Concern

- 5.1. Employees who wish to report any reasonable suspicion of concern should first raise the matter with his/her Head of Department, who will escalate the matter to the Whistle-blowing Team, which comprises the Executive Pastors (EPs) and Head of HR (HR).
- 5.2. If the immediate Head of Department is reluctant to raise the concern or is the subject of the concern, the whistle-blower can raise the concern directly to the Whistle-blowing Team by writing an email to whistleblowing@fcbc.org.sg.
- 5.3. If the concern involves key management personnel, members of the Whistle-blowing Team, or is exceptionally serious, employees can report to the Audit Committee (AuditCommittee@fcbc.org.sg).
- 5.4. External parties who wish to make a whistle-blowing report can do so through these reporting channels:

Email : WhistleBlowing@fcbc.org.sg
Mail : FCBC Whistle-blowing Team
Faith Community Baptist Church
12 Tai Seng Street, #04-01A
Luxasia Building
Singapore 534118

The above information on reporting channels is to be made available on our website.

Refer to Appendix 1 on "Ways to Raise a Concern for Employees and Other Stakeholders".

- 5.5. Whistle-blowers who wish to make a written report through email should use the following format.
 - 5.5.1. Set out the background and history of the concern.
 - 5.5.2. Explain the reason why you are particularly concerned about the situation.
 - 5.5.3. Produce documentary or circumstantial evidence, including statements, records and testimonies, as well as lead or tip-off to person(s) and/or corporation(s) with relevant information or knowledge.

- 5.6. All whistle-blowers are encouraged to provide their names and contact numbers to the allegations, in case further information or clarification is required. Concerns expressed anonymously are much less persuasive and may be more difficult to act upon effectively. Information provided anonymously will be investigated on its merits and confirmation from attributable sources and information provided.
- 5.7. The Organisation will ensure that the whistle-blower's identity and the concerns raised are kept confidential, unless required by the law to reveal to parties such as lawyers, the police or investigators.
- 5.8. Once a written report is received by the Whistle-blowing Team, they will assess the report and the EPs will carry out the investigation.

6. The Investigative Process

- 6.1. HR receives and keeps a log of all reports received by the Whistle-blowing Team.
- 6.2. EPs will evaluate and assess the matter to establish whether the concerns raised are valid or substantial to warrant further investigation.
- 6.3. EPs to carry out the investigation and update Management on the progress and findings.
- 6.4. After the completion of the investigation, EPs will submit the Investigative Report, including recommendations on follow-up action, to the Management and Council.
- 6.5. Management and Council will review the Investigative Report and the recommendations, and approve the course of action to be taken.
- 6.6. Once the Investigative Report has been finalized, Management and Council will ensure all relevant parties are informed of the corrective and preventive actions to be taken.
- 6.7. A further review is to be done after three months to ensure the corrective and/or preventive actions taken have solved the issues identified.

7. Changes to the Whistle-blowing Policy

From time to time, the whistle-blowing policy will be changed to keep up with our values, best practices, and improvements, as well as legislation and regulations. Any changes to our whistle-blowing policy will be communicated to all employees.

Appendix 1: Ways to Raise a Concern for Employees and Other Stakeholders

