



WHISTLE-BLOWING POLICY

[July 2020]

1. Policy Objectives and Scope

- 1.1. A whistle-blow, is to report of concerns by employees, stakeholders or members of public made in good faith on suspected misconduct, malpractice or fraudulent activity that may be detrimental to PAVE and/or the public interest. Whistle-blowing procedures are a part of sound governance.
- 1.2. PAVE is committed to a high standard of transparency, integrity, compliance and accountability. The whistle-blowing policy aims to provide a mechanism through which employees, stakeholders or members of the public can, in good faith, report any activity that infringes on PAVE's code of conduct or violates the law so that PAVE may take the relevant action.

2. Procedures

- 2.1. The PAVE Management Committee ("Management Committee") oversees the whistle-blowing practices in PAVE.
- 2.2. All reports received will be channeled to Chairman of the PAVE Audit Committee ("Audit Committee") and reported to the President of PAVE ("President").

3. Whistle-blowing concerns

- 3.1. The policy covers serious concerns that could have a significant impact on PAVE. These include:
 - i. Fraudulent activities
 - ii. Incorrect financial reporting
 - iii. Unlawful activities
 - iv. Misconduct
 - v. Unethical conduct

4. Confidentiality

- 4.1 Reports of whistle-blowing concerns are kept confidential to the extent possible to meet the needs of the investigation. Aligned with the spirit of confidentiality, the identity of the whistleblower must be protected, except when the disclosure to the regulatory authorities is required.
- 4.2. PAVE is not obliged to investigate anonymous reports.

5. Protection

- 5.1. PAVE is committed to protect a person who reports in good faith from intimidation, retaliation or adverse employment consequence.
- 5.2. PAVE does not condone any reprisal, discrimination or harassment against whistle-blowers who report in good faith.
- 5.3. PAVE 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.

6. Reporting channels

- 6.1. If employees or members of the public have a cause to suspect serious concerns, a report can be lodged in the following manner using the standard “Whistle-Blower Report Form” (see Annex A) containing information required to facilitate assessment and investigation.
 - i. by email to whistleblow@pave.org.sg
 - ii. by postal mail to:
PAVE Audit Committee
Blk 211 #01-1446
Ang Mo Kio Avenue 3
Singapore 560211
 - iii. Report in person at PAVE office located at Blk 211 Ang Mo Kio Avenue 3
Singapore 560211.
- 6.2. All reports received will be channeled to the Chairman of the Audit Committee, who will advise the President as necessary.

7. Assessment of concerns raised

- 7.1. Assessment of the concern is based on the nature and severity of the concern raised and the credibility of the information, including the sources. The Audit Committee shall perform the preliminary assessment on whether an investigation is required to examine the issues raised.
- 7.2. All assessments and analysis are to be properly documented and reported to the Management Committee.
- 7.3. The Management Committee reserves the right to decide, at its discretion, not to conduct an investigation on an anonymous whistle blowing concern.

7.4. Investigation

- 7.5. On receiving the assessment and analysis report from the Audit Committee, the Management Committee shall decide on the severity and authenticity of the concern.

For a serious concern, e.g. alleged criminal offence, the matter shall be reported to the relevant external agency.

- 7.6. Inappropriate concerns will not be investigated and the staff that made the allegation may be subjected to disciplinary action. Except for anonymous reports, the whistle-blowers may be contacted for clarification or further details.
- 7.7. The Management Committee reserves the right to set up an Investigation Team to look into issues that require further investigation. The Investigation Team shall document and report all findings to the Audit Committee. The Audit Committee shall then propose a course of action to the Management Committee for approval. The Investigation Team shall then carry out the course of action and follow up to ensure proper closure of the case.
- 7.8. Decisions and outcomes shall be communicated to the appropriate parties within reasonable timeline.

8. Communications & training

- 8.1. The whistle-blowing policy is made available to all employees of PAVE and the public on PAVE's website.
- 8.2. The whistle-blowing policy is communicated to the Management Committee members and all staff when they join PAVE. They are briefed on any updates as appropriate. Staff should confirm annually that they have read and understood the whistle-blowing policy. For assistance on whistle-blowing matters, employees may approach the Human Resource Manager, the President or Audit Committee members.
- 8.3. PAVE supports the training of Officers involved in whistle-blowing to stay abreast of developments and to be properly equipped to handle whistle-blowing matters.

9. Monitor & Review

- 9.1. PAVE Audit Committee monitors the status of the whistle-blowing process to ensure that it is operating as designed. The monitored results should be reported to the Management Committee.
- 9.2. The whistle-blowing policy shall be reviewed internally for its design effectiveness and feasibility. The review is conducted annually or as directed by the Management Committee, whichever is earlier.

Annex A



Whistle-Blowing Report Form

Whistle-blower's details			
Name:		Contact number:	
Designation:		Email address:	
Department:		Address:	
Can you be contacted if more information is required?			*Yes / No
Alleged Party's details			
Name:		Contact number:	
Designation:		Email address:	
Department:			
Witness's details (if any)			
Name:		Contact number:	
Designation:		Email address:	
Department:			
Are you willing to come forward to provide more in-depth information if required			*Yes / No

Concern / Complaint

*Describe the misconduct and how you have come to know about it.

1. Who has committed the misconduct?

2. What is/are the misconduct?

3. When did the misconduct occur and when did you notice it?

4. Where did the misconduct occur?

5. Have you approached the person? If yes, what was his/her response?

6. Do you have any evidence to provide?

7. Is there more than one party involved?

8. Do you have any other details or information to provide that will facilitate the investigation?	
9. Have you reported the incident internally or through any other channels? If yes, to whom have you made the report?	
Date:	Signature:

You may submit the completed form by the following method:		
(a) Email to: whistleblow@pave.org.sg	(b) Postal Mail to: Chairman PAVE Audit Committee Blk 211 #01-1446 Ang Mo Kio Avenue 3 Singapore 560211	(c) Submit in person to: PAVE Blk 211 #01-1446 Ang Mo Kio Avenue 3 Singapore 560211

You may attach a longer statement.

PAVE Whistleblowing Process

