

# Whistleblowing Policy

## POLICY

This Whistleblowing Policy (“the Policy”) is intended to provide a framework to promote responsible and secure whistleblowing without fear of adverse consequences and repercussions.

Employees, members and outside parties, such as suppliers and contractors, may use the procedures set out in the Policy to report any concern or complaint regarding questionable accounting or auditing matters, internal controls, disclosure matters, conflict of interest, serious breaches of Co-op’s policy, unsafe work practices or any other matters involving fraud, corruption and employee misconduct.

The Policy allows for reporting by employees; members and outside parties of such matters to the Audit Committee Chairman, without fear of reprisal, discrimination or adverse consequences, and also permits the Board to address such reports by taking appropriate action, including, but not limited to, disciplining or terminating the employment and/or services of those responsible.

The Policy is meant to protect genuine whistle blowers from any unfair treatment as a result of their report. Frivolous and bogus complaints will be disregarded. The Policy is also not a route for taking up personal grievances. These should continue to be taken up directly with the Board of Directors.

## REPORTING MECHANISMS

Citiport Credit Co-operative Ltd (“the Co-operative”) encourages employees and external parties to put their names to their allegations whenever possible. Concerns or irregularities expressed anonymously are more difficult to act upon effectively but they will be considered, taking into account the following:

Seriousness of issues raised;  
Significance and credibility of concerns;  
Likelihood of confirming the allegation from attributable sources and information provided;  
All non-anonymous valid concerns or irregularities raised will be acknowledged and treated with confidence throughout the process.

Concerns may be raised verbally or in writing. The Officer in charge is the Chairman of the Audit Committee. He is an independent director and can be accessed vide email or by post:  
**email: citiport1@citiport.org.sg**

By Post:  
**Chairman of Audit Committee  
Citiport Credit Co-operative Ltd  
218 Pasir Panjang Road #02-03  
ICON@PASIR PANJANG  
Singapore 115597**

## **SAFEGUARDS**

The Co-operative prohibits discrimination, retaliation or harassment of any kind against a whistle blower who submits a complaint or report in good faith. If a whistle blower believes that he or she is being subjected to discrimination, retaliation or harassment for having made a report under this Policy, he or she should immediately report those facts to the CEO. Reporting should be done promptly to facilitate immediate investigation and the taking of appropriate action.

At the appropriate time, the party making the report/complaint may need to come forward as a witness. If an employee or external party makes an allegation in good faith but it is not confirmed by the investigation, no action will be taken against him or her. If, however, an employee has made an allegation frivolously, maliciously or for personal gain, disciplinary action may be taken against him or her. Likewise, if investigations reveal that the external party making the complaint had done so maliciously or for personal gain, appropriate action, including reporting the matter to the police, may be taken.

## **COMPLAINTS HANDLING**

All information disclosed during the course of investigation will remain confidential, except as necessary or appropriate to conduct the investigation and to take any remedial action, in accordance with any applicable laws and regulations.

The Co-operative reserves the right to refer any concern or complaint to appropriate external regulatory authorities. Depending on the nature of the complaint, the subject of the complaint may be informed of the allegations against him or her and be provided with an opportunity to reply to such allegations. Employees who fail to cooperate in an investigation, or deliberately provide false information during an investigation, shall be subject to strict disciplinary action up to, and including dismissal.

If, at the conclusion of an investigation, the Co-operative determines that a violation has occurred or the allegations are substantiated, appropriate disciplinary action in accordance with the employment contract will be taken. Non-anonymous whistle blowers will be informed that action has been taken at the conclusion of the investigation, without divulging confidential information.